

EXHIBIT 4

David M. Zeff (SB# 63289)
Law Offices Of David M. Zeff
1100 Larkspur Landing Circle, Suite 350
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Attorneys for Plaintiff
FREDERICK C. FIECHTER

ELECTRONICALLY
FILED

Superior Court of California,
County of San Francisco

10/18/2019
Clerk of the Court
BY: RONNIE OTERO
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO
UNLIMITED CIVIL CASE

FREDERICK C. FIECHTER, an
Individual

Plaintiff,

v.

CARL WESCOTT, an individual, et al.,
Defendants.

Case No.: CGC-10-496091

DECLARATION OF DAVID M. ZEFF
IN SUPPORT OF MOTION FOR
ASSIGNMENT AND CHARGING
ORDERS

Date: November 15, 2019

Time: 9:30 a.m.

Dept.: 302, Law & Motion

Action Filed: January 15, 2010

Judgment Entered July 15, 2016

Reservation No. 010151115-14

I, David M. Zeff, declare and state:

1. I am an attorney licensed since 1974 to practice in all Courts of the State of California, and the attorney for Judgment Creditor Frederick C. Fiechter in this proceeding. I have personal knowledge of the matters stated herein, and if called as a witness would testify from personal knowledge as follows, except as to those matters stated on information and belief, and, as to those matters, I am informed and believe that they are true.

2. I represented and continue to represent Mr. Fiechter in two actions against Mr. Wescott, the instant matter and the matter entitled *Fiechter v. Westcott*, SF Sup. Ct No. CPF 11 511547. Judgment entered: September 6, 2011, renewed August 28, 2015.

Said action is enforcement of a Sister State Judgment in which the principal amount owed as of December 2, 2015, was \$1,822,845.40. Pursuant to my recent Declaration a current Memorandum of Costs After Judgment filed herein on October 11, 2019, the sum total now due on that Judgment, after credits, is more than \$2,574,452.76. The only judgment credit to Mr. Wescott is in the CPF 11 511547 case in the sum of \$503.50, which was obtained as the result of a judgment levy on Wescott's PayPal accounts. Mr. Wescott has never voluntarily made any payment on either judgment and has, as described below, lied to me in communications and to the Courts in sworn declarations about having no assets or income.

3. Judgment in the instant proceeding was entered on July 14, 2015. A true copy of an Abstract of Judgment entered in this matter on November 2, 2015 is attached as **Exhibit 1**. It reflects the sum of \$1,490,032.31 due and owing on this Judgment as of October 13, 2015. Pursuant to my recent Declaration a current Memorandum of Costs After Judgment filed herein on October 11, 2019, the sum total now due on the Judgment, in this proceeding is more than \$ 2,117,632.85.

4. In the course of my efforts to collect these judgments from Mr. Wescott, between May 15 and June 17, 2019, he and I exchanged a string of emails, true copies of which are attached hereto as group **Exhibit 2**, in which Wescott asserts that he is so impecunious that he qualified for and was receiving Food Stamps and MediCal, and then sends proof of same. He does not disclose any income or assets, but instead claims he has neither. The documents which follow show said claims by Wescott to be false, and also show that his In Forma Pauperis applications to this Court and others were likely perjured.

5. In Action No. CPF 11 511547, we served levies by Writ of Execution and Also served Subpoenas Duces Teca on Six SparkLabs entities. That discovery has shown that Wescott was and may still be a Managing Member of SparkLabs IoT, LLC, which is headquartered in Korea, and he appears to have a 3% ownership share and between a 37% and 42% distribution interest. The documents reflecting this information are

1 attached hereto as **Exhibit 3** hereto, which is a true copy of a letter dated July 9, 2019,
 2 from Attorney Jonathan Elefant of the Cooley firm, who at that time was representing the
 3 six SparkLabs entities we levied and served Subpoenas on, which letter accompanied the
 4 SparkLabs amended production of documents, which were identically produced by all six
 5 of the SparkLabs entities we subpoenaed, numbered documents SPARKLABS000001-
 6 000004, which are part of Exhibit 3.

7 6. We also served post judgment levies and third-party discovery to PayPal,
 8 Inc. in Action No. CPF 11 511547. In response to our Subpoena Duces Tecum to PayPal,
 9 Inc. for Mr. Wescott's records, we were provided with raw data Excel Spreadsheets, a
 10 summary of which is attached hereto as **Exhibit 4** showing each person or entity who has
 11 made payments made to Mr. Wescott via his PayPal account during the time period from
 12 2017 to 2019. These PayPal documents show income of \$93,242.77 which Mr. Wescott
 13 had in the years 2017 through early 2019, and of course he likely had other sources of
 14 income which we have not yet found. Attached hereto as **Exhibit 21** is a true copy of a
 15 pdf created by my assistant which summarizes all of the income which Wescott showed
 16 in his subpoenaed PayPal account for 2017 – 2019. That income included the following
 17 sources and amounts:

18	Anthony Turino	\$ 4,985.00
19	Bernard Moon, CEO of SparkLabs:	\$ 3,496.66
20	Daniel Anderson	\$ 1,000.00
21	Jonas Goodman	\$ 1,772.50
22	Michael Shea	\$ 2,500.00
23	Nicole Wescott	\$ 2,000.00
24	Olga Africawala	\$ 509.00
25	Robert Block	\$ 725.00
26	William Russ	<u>\$71,330.00</u>
27	TOTAL =	\$88,818.16

28 //

7. In January of 2019, Mr. Fiechter's bankruptcy counsel, Craig Welch, was contacted by a person named Robert J. Block about Mr. Wescott. I then responded to Mr. Block for Mr. Welch. Attached hereto as **Exhibits 5 through 9** are a string of emails I received from Mr. Block between August 7 and 9, 2019, along with the THIRD PARTY SPARKLABS Responses to a subpoena duces tecum served upon it by Wescott's former wife, Monette Stephens, in her action to collect child support awarded by this Court in FDI-14-781666, which document was also sent to me by Mr. Block, and is attached and referred to below as **Exhibit 15**. In a phone conversation with me, Mr. Block informed me that he has known Mr. Wescott for more than two years, that Block was once a licensed attorney but has not been one for many years, that at no time that he was a licensed attorney did Block provide any legal services of any kind for Mr. Wescott, and that Block has not had and currently does not have a confidential, fiduciary or contractual relationship with Mr. Wescott which would cause Block to owe Wescott any duty of confidentiality. This was confirmed by Block in **Exhibit 7** hereto. Mr. Block further informed me that he has provided Mr. Wescott technical writing and copy-editing services and, on occasion, non-regulated financial consulting services. Block told me that in the course of his relationship with Wescott, he has learned about Wescott's dealings with various Sparklabs, LLC's and their CEO, Bernard Moon. Block confirmed this in **Exhibits 5, 7, 8 and 9** hereto. Mr. Block confirmed to me that because Mr. Wescott is a judgment debtor, he has had Mr. Moon pay Mr. Block directly for his services to Wescott to avoid the judgments held by Mr. Fiechter and Wescott's former wife, Monette Stephens. **See Exhibits 5, 7, 8 and 12** (May 29, 2019 PayPal of \$1000 from Moon to Block). In our conversations and emails, Mr. Block reported to me that Mr. Wescott has repeatedly told him that Wescott is owed hundreds of thousands of dollars by Sparklabs as quantum meruit for the work Wescott has done traveling the world promoting the various LLC's of Sparklabs in which Mr. Wescott is a member. **Exhibits 7, 8 and 9** confirm this claim by Wescott against SparkLabs. Mr. Block told me that Wescott had paid him tens of thousands of dollars since 2017 via PayPal and

Block gave my office access to his PayPal account so that we could extract from it all the payment he received from Wescott. Attached hereto as **Exhibit 10** is a summary my assistant extracted from Mr. Block's PayPal account showing that Wescott made of payments totaling \$43,850.88 to Block between October 6, 2017 and February 1, 2019. In our conversations and in Exhibits 6 and 10 hereto, Block confirms that Wescott is using SideCoast, Inc. and its bank accounts to hide money from creditors and to pay Wescott's travel expenses and Mr. Block. In our conversations Block agreed to provide me with a Declaration under penalty of perjury to support the above facts. I drafted that declaration and sent him to him for editing, but then he went silent. I did not hear from Block again until September 12, 2019, when I received his email, a true copy of which is attached hereto as **Exhibit 11**. I have since asked Block for a declaration but he has declined citing Wescott's threats.

8. Attached hereto as **Exhibit 12** is a true copy of Bernard Moon's responses to a Subpoena Duces Tecum we served upon Moon which shows that from February 20, 2019, through May 29, 2019, Mr. Moon sent to Mr. Wescott sums totaling \$3,996.66 via PayPal, and Moon also paid Mr. Block the sum of \$1,000 on Mr. Wescott's behalf.

9. As stated above in paragraph 6, Mr. Block reported to me that Mr. Wescott has repeatedly told him that Wescott is owed hundreds of thousands of dollars by Sparklabs as quantum meruit for the work Wescott has done traveling the world promoting the various LLC's of Sparklabs in which Mr. Wescott is a member. In our discovery of Mr. Wescott's PayPal account, we found travel expenses for Wescott in the past two years totaling \$ 3,752.26, as summarized by my assistant in **Exhibit 13**, attached hereto.

10. In our discovery of Mr. Wescott's PayPal account, his transaction activity during the years 2002 to 2019 also shows the locations where he has logged into his account while traveling the world, attached hereto as **Exhibit 14**. The locations include: Middletown, NJ; Seattle, WA; Redmond, WA; San Francisco, CA; Key Biscayne, FL; Male, Maldives; Bonn, Denmark; Stuttgart, Denmark; Mexico City, Mexico; Buenos Aires, Argentina; Lima, Peru; Tampere, Finland; Santa Clara, CA; Livingston, VT;

1 Phoenix, AZ; Fish Hoek, New Zealand; Singapore; Tampa, FL; Masqat, Oman; and
 2 Portland, OR.

3 11. Attached hereto as **Exhibit 15** is a true copy of the March 21, 2019
 4 THIRD PARTY SPARKLABS MANAGEMENT LLC'S OBJECTIONS AND
 5 RESPONSE TO DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS
 6 RECORDS TO SPARKLABS GLOBAL VENTURES MANAGEMENT, LLC which I
 7 obtained from Mr. Block. The attachments to that document identified as
 8 "SPARKLABS000002" through SPARKLABS000005" show that Mr. Wescott was
 9 offered the position as Managing Partner for an entity known as SparkLabs Iot, and
 10 offered a 3% carried equity interest and between a 37% and 42% distribution interest.
 11 Again, Mr. Block told me that it was the work that Mr. Wescott did in pursuit of this
 12 endeavor that resulted in his quantum meruit claim for services against SparkLabs. Mr.
 13 Block also told me in August, 2019, that that SparkLabs will very soon send Mr. Wescott
 14 a \$50,000 payment in the coming days to settle his quantum meruit claim. See Exhibits
 15 5, 7, 8 and 9 hereto. It is likely, from Block's communications with Mr. Wescott, that
 16 Wescott and Moon have masked or will mask this payment and divert it in such a way as
 17 to avoid Wescott's creditors, Mr. Fiechter and Ms. Stephens.

18 12. In response to our levies of execution upon Mr. Moon personally and upon
 19 SparkLabs, Inc, none have disclosed that they hold anything of value for Mr. Wescott or
 20 that they owe him anything. Attached hereto as **Exhibit 16** are true copies of the
 21 Memoranda of Garnishees Bernard Moon and three of the six SparkLabs entities levied
 22 upon which reported, under oath, nothing owing to Mr. Wescott. However, given the
 23 information we have from Mr. Block, we have reason to believe that these Garnishee
 24 Memoranda may be false. In an email from Wescott to Block, dated June 25, 2019,
 25 provided to us by Mr. Block, a true copy of which is attached hereto as **Exhibit 8**, Mr.
 26 Wescott asserted that Mr. Moon committed perjury in his Response under oath to a
 27 Subpoena Duces Tecum to SparkLabs from Wescott's ex-wife, Ms. Stephens. Mr.
 28 Wescott is referring to the answers under oath from SparkLabs, verified by Mr. Moon,

1 that said entity did not owe any compensation to Mr. Wescott, in view of Wescott's claim
 2 for the above quantum meruit payment and SparkLabs' purported agreement to pay him
 3 at least \$50,000 to settle that claim. A true copy of Moon's Response to Stephen's
 4 Subpoena, also provided to us by Mr. Block, is attached as **Exhibit 15**. This \$50,000
 5 payment is the major subject of the instant request for the charging and assignment
 6 orders.

7 13. In the course of our judgment collection efforts, we were aware that Mr.
 8 Wescott was the person who formed a California Corporation known as Side Coast, Inc.
 9 and was its first director. Attached hereto as **Exhibit 17** is a true copy of the Articles of
 10 Incorporation of said corporation which we obtained from the California Secretary of
 11 State's website. It shows Mr. Wescott's address as director as PO Box 1304, Sausalito,
 12 California. The Secretary of State's office website also shows that the corporation is
 13 suspended. All of our efforts to contact the Agent for service of process, Percy Haulund,
 14 shown on **Exhibit 17** and on the Secretary of State's website, were fruitless. In Action
 15 No. CPF 11 511547, we tried to serve Mr. Haulund at the address shown with a Writ of
 16 Execution and Subpoena Duces Tecum, but he was not at that address. We also served
 17 those documents on Mr. Wescott. In neither case was there any response to the Writ or
 18 Subpoena by Side Coast, Inc. Attached hereto as **Exhibit 18** is a true copy of a filing by
 19 Mr. Wescott on July 10, 2017, in his now dismissed Northern District Bankruptcy
 20 proceeding, in which he lists his "new" address as the same PO Box as that given as
 21 director of Side Coast, Inc. in **Exhibit 17**. We have long suspected that Mr. Wescott was
 22 using Side Coast, Inc. as a corporate shell to hide income and expenses from his
 23 judgment creditors. In **Exhibit 9** hereto, Mr. Block confirms that in his dealings with Mr.
 24 Wescott, he has known Wescott to use Side Coast's Bank of America account No.
 25 325074917914 to funnel money under his control out of the view and reach of his
 26 creditors and that Block has personally received funds from Mr. Wescott from this
 27 account. This Account is another primary target of our request for assignment and
 28 charging orders.

14. We are aware that in this case on September 3, 2019, Mr. Wescott filed an in forma pauperis application and was granted a fee waiver. He has also filed in forma pauperis applications in the following State Court cases in the past 3 years and been granted fee waivers:

- San Francisco Superior Court Case Number: CGC17561051,
JOHN MATTHESEN VS. CARL A WESCOTT ET AL
- San Francisco Superior Court Case Number: CGC17561757,
JIM MOTTER VS. MONETTE STEPHENS ET AL
- Kern County Superior Court Case Number: S1500CV274541,
ANDERSON VS SURPRISE [Defendant: WESCOTT, CARL]
- San Francisco Superior Court Case Number: CGC17562532,
CARL WESCOTT VS. ROSA MEJIASALVADOR ET AL
- San Francisco Superior Court Case Number: CGC19575884,
CARL WESCOTT VS. KEN TRAINOR ET AL
- California First Appellate District, Appeals Court Case Number A151786,
CARL WESCOTT VS. MONETTE STEPHENS
- California First Appellate District, Appeals Court Case Number A152932,
CARL WESCOTT VS. MONETTE STEPHENS

Said applications are held by the State Courts as confidential, which precludes any conclusion by the undersigned as to the truth of the declarations by Wescott concerning his income or lack thereof. Surely in view of the PayPal income we found for Wescott in the above Exhibits, his statement to me in Exhibit 2 about his total “revenue” in the last 4.5 years of \$5,000 was false. We also strongly doubt that, if he has indeed qualified for MediCal or Food Stamps, Wescott truthfully reported the \$93,242.77 in income we have documented above. This statement is supported by **Exhibits 19 and 20** attached hereto, which are two *non-confidential* In Forma Pauperis declarations Wescott gave under penalty of perjury this year, 2019, in two cases in the United States District Court for the Northern District of California, Action Nos. CV 19 1640 KAW and CV 19-2084 JST.

1 These are true copies of documents obtained by my office from the District Court's
2 website. In neither Declaration in those Federal Court cases did Wescott disclose the
3 income we have documented above. Rather in his declaration under penalty of perjury in
4 the latter case, **Exhibit 20**, he stated, when asked about income: "I received \$5,000 in the
5 last 12 months from consulting. That is my total earned income since 9/1/2014." Based
6 upon the foregoing, it is respectfully suggested to both this Court, the other above
7 referenced State Courts, and the United States District Court for the Northern District of
8 California do a complete investigation as to the veracity of the information given under
9 oath by Mr. Wescott to obtain the fee waivers he has been granted.

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct.

12
13 Dated: October 18, 2019



David M. Zeff

EXHIBIT 1

EJ-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, and State Bar number):

After recording, return to:

David M. Zeff (Bar # 63289)
 Law Offices of David M. Zeff
 1100 Larkspur Landing Circle, Suite 200
 Larkspur, CA 94939

TEL NO.: (415) 923-1380 FAX NO. (optional): (415) 923-1382

E-MAIL ADDRESS (Optional): dmz@zefflaw.com

☒ ATTORNEY FOR ☒ JUDGMENT CREDITOR ☐ ASSIGNEE OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

STREET ADDRESS: 400 McAllister Street, Room 103

MAILING ADDRESS:

CITY AND ZIP CODE: San Francisco 94102

BRANCH NAME:

FOR RECORDER'S USE ONLY

PLAINTIFF: Frederick C. Fiechter
 DEFENDANT: Carl Wescott aka Carl A. Wescott

CASE NUMBER:

CGC 10 496091

**ABSTRACT OF JUDGMENT—CIVIL
 AND SMALL CLAIMS**

☐ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record applies for an abstract of judgment and represents the following:

a. Judgment debtor's

Name and last known address

Carl Wescott aka Carl A. Wescott
 San Pedro Sula, Honduras and
 P.O. Box 191273, San Francisco, CA 94119

b. Driver's license no. [last 4 digits] and state:

☒ Unknown

c. Social security no. [last 4 digits]: 8664

☐ Unknown

d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):

Carl Wescott
 P.O. Box 191273, San Francisco, CA 94119

2. ☐ Information on additional judgment debtors is shown on page 2.

4. ☐ Information on additional judgment creditors is shown on page 2.

3. Judgment creditor (name and address):

Frederick C. Fiechter

1896 Pacific Avenue, #502, San Francisco, California 94117

5. ☐ Original abstract recorded in this county:

a. Date:

b. Instrument No.:

Date: October 13, 2015

David M. Zeff

(TYPE OR PRINT NAME)

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:
 \$ 1,490,032.31

7. All judgment creditors and debtors are listed on this abstract.

8. a. Judgment entered on (date): July 14, 2015

b. Renewal entered on (date):

9. ☐ This judgment is an installment judgment.

10. ☐ An ☐ execution lien ☐ attachment lien is endorsed on the judgment as follows:

a. Amount: \$

b. In favor of (name and address):

11. A stay of enforcement has

a. ☒ not been ordered by the court.b. ☐ been ordered by the court effective until (date):

12. a. ☒ I certify that this is a true and correct abstract of the judgment entered in this action.

b. ☐ A certified copy of the judgment is attached.

CLERK OF THE COURT

MADONNA CARANTO

Clerk, by

, Deputy



This abstract issued on (date):

NOV - 2 2015

PLAINTIFF: Frederick C. Fiechter
 DEFENDANT: Carl Wescott aka Carl A. Wescott

COURT CASE NO.:
 CGC 10 496091

NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:

13. Judgment creditor (*name and address*):

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:

16. Name and last known address

--	--

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

17. Name and last known address

--	--

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

--	--

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

19. Name and last known address

--	--

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.

EXHIBIT 2

David Zeff

From: Carl Wescott <carlawescottiii@gmail.com>
Sent: Wednesday, May 15, 2019 2:30 PM
To: dmz@zefflaw.com; Carl Wescott
Subject: some facts for your consideration with settlement offer

Follow Up Flag: Follow up
Flag Status: Flagged

[for settlement only]

Mr. Zeff,

As of last Thursday I had either \$0 or -\$3.50 depending on timing in my PP account.

On Friday I received a \$500 Paypal which is being reversed.

I have been on food stamps for the great majority of the last 3 years, including now. I've been homeless for the great majority of the past 4.5 years.

My total revenue (other than minor expense reimbursements) for the past 4.5 years is \$5000, which cost me more than \$5000 to generate (costs for that sole proprietorship).

I have no assets of significance other than legal claims.

I lost everything of value in a chapter 7 in 2012 and whatever remained went to my ex-wife.

It's my understanding that you are alleging liquid assets in overseas bank accounts to Cooley LLP. The only overseas bank account I've ever had is in Ecuador where there might be under \$100 if not all eaten away in fees in the last 8 years since I went to that bank.

From your subpoena it's clear to me you induced a fiduciary breach. I'm willing to settle that issue for \$10,000 as to you as the Defendant if we sign a simple agreement (which I will draft) in the next day or two and you provide the money this week

In California as you might be aware the order of payments to creditors is:

- * Child Support
- * Spousal Support
- * Other Payments to Spouse
- * All other creditors

Mr. Fiechter is in the 4th category.

If you take 30 minutes to do a little digging you'll see that I owe over US \$10 million in the first 3 categories. A helpful clue: FDI-14-781666.

Bottom line: you're wasting your client's money. Or, in the unlikely case that you will now not bill him for your recent time, you're wasting your valuable time.

He should have almost no expectation of receiving any money from me in his or my lifetime :-).

See you in court, most likely.

CAW +1 415 335 5000

On Wed, May 15, 2019 at 2:13 PM Carl Wescott <carlawescottiii@gmail.com> wrote:
Mr. Zeff,

I received an email stating that Paypal had received a Writ and Notice of Levy from you.

I have not received any served documents from Mr. Fiechter since 2011 or possibly early 2012, or from you since 2011 or early 2012.

My address for future legal correspondence is PO Box 1906 SF CA 94119.

This is a good email address for me. Please send digital copies of all items in the future. I will do the same.

If you'd like to bilaterally agree to electronic service, I will do so and then we can both skip the inefficient USnail system.

Please send me a copy of the Notice of Writ and Levy immediately by email.

Thank you

CAW +1 415 335 5000

David Zeff

From: Carl Wescott <carlwescott42@gmail.com>
Sent: Monday, June 17, 2019 6:51 PM
To: David Zeff
Subject: Re: Writ and Notice of Levy Fiechter v. Wescott, our file 9415-1

Follow Up Flag: Follow up
Flag Status: Flagged

Currently on both. Will email. CAW

Telepathically sent to Siri who hopefully got it right.

On Jun 17, 2019, at 1:37 PM, David Zeff <dmz@zefflaw.com> wrote:

Dear Mr. Wescott:

I would of course be interested in any proof you may provide that you are currently or have in the past been on Food Stamps and MEDI-CAL.
Please forward that when you can. Thank you,

David M. Zeff
Law Offices Of David M. Zeff
1100 Larkspur Landing Circle, Suite 350
Larkspur, CA 94939
Tel: (415) 923-1380 Fax: (415) 923-1382
dmz@zefflaw.com

From: Carl Wescott <carlawescottiii@gmail.com>
Sent: Friday, May 17, 2019 5:11 PM
To: David Zeff <dmz@zefflaw.com>; Carl A Wescott <carlawescottiii@gmail.com>
Cc: Carl Wescott <carlwescott42@gmail.com>; Michelle Knutson <dmzofficemichelle@gmail.com>; Robert Weaver <rnweaver@pacbell.net>
Subject: Re: Writ and Notice of Levy Fiechter v. Wescott, our file 9415-1

Thank you Mr. Zeff.

I am not sure I have to provide you with an address for physical service, not that I expect you will have anything to serve personally. Let me research this issue and if it appears that I need to provide such as a matter of law, I will do so.

Thank you for using my new address. Now that I'm aware of this case proceeding in 2015, I will update the court, too, and file documents there that I will serve upon you.

I hope we can continue the courteous dialogue (which I appreciate). I also appreciate your responsiveness.

I will continue to be attentive to your communications. When I get a chance I will email you the marital dissolution judgment which will provide part of the information I cited.

One of the documents that I will file will be a fee waiver request, which will cite my being on MEDI-CAL and food stamps, as well as my lack of income.

CAW +1 415 335 5000

On Thu, May 16, 2019 at 12:39 PM David Zeff <dmz@zefflaw.com> wrote:

Mr. Wescott:

In reply to your email below, I respond as follows:

1. As stated below, We served all papers at the addresses and PO Boxes you had on record on this case and others. It is your duty, not ours, to keep your addresses current in such court matters. We will use your PO Box below for all service in this case. But we also need an address where you may be personally served. Please provide that.
2. We do not agree to email service for anything.
3. I will email you copies of the Levies and Subpoenas today or tomorrow, as my schedule permits.

I will respond separately to your other email sent yesterday.

David M. Zeff

Law Offices Of David M. Zeff

1100 Larkspur Landing Circle, Suite 350

Larkspur, CA 94939

Tel: (415) 923-1380 Fax: (415) 923-1382

dmz@zefflaw.com

From: David Zeff <dmz@zefflaw.com>

Sent: Wednesday, May 15, 2019 3:09 PM

To: 'Carl Wescott' <carlawescottiii@gmail.com>; 'Carl Wescott' <carlwescott42@gmail.com>

Cc: 'Michelle Knutson' <dmzofficemichelle@gmail.com>; 'David Zeff' <dmz@zefflaw.com>

Subject: RE: Writ and Notice of Levy Fiechter v. Wescott, our file 9415-1

Dear Mr. Wescott:

Thank you for this email. We served all papers at the addresses and PO Boxes you had on record on this case and others. It is your duty, not ours, to keep your addresses current in such court matters.

Tomorrow we will email to you copies of all Writs and Subpoenas served.

I will ask my client if he will agree to email service on these matters and get back to you.

VTY,

David M. Zeff

Law Offices Of David M. Zeff

1100 Larkspur Landing Circle, Suite 350

Larkspur, CA 94939

Tel: (415) 923-1380 Fax: (415) 923-1382

dmz@zefflaw.com

From: Carl Wescott <carlawescottiii@gmail.com>

Sent: Wednesday, May 15, 2019 2:13 PM

To: dmz@zefflaw.com; Carl Wescott <carlwescott42@gmail.com>

Subject: Writ and Notice of Levy

Mr. Zeff,

I received an email stating that Paypal had received a Writ and Notice of Levy from you.

I have not received any served documents from Mr. Fiechter since 2011 or possibly early 2012, or from you since 2011 or early 2012.

My address for future legal correspondence is PO Box 1906 SF CA 94119.

This is a good email address for me. Please send digital copies of all items in the future. I will do the same.

If you'd like to bilaterally agree to electronic service, I will do so and then we can both skip the inefficient USnail system.

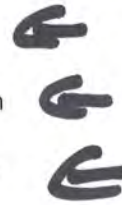
Please send me a copy of the Notice of Writ and Levy immediately by email.

Thank you

CAW +1 415 335 5000

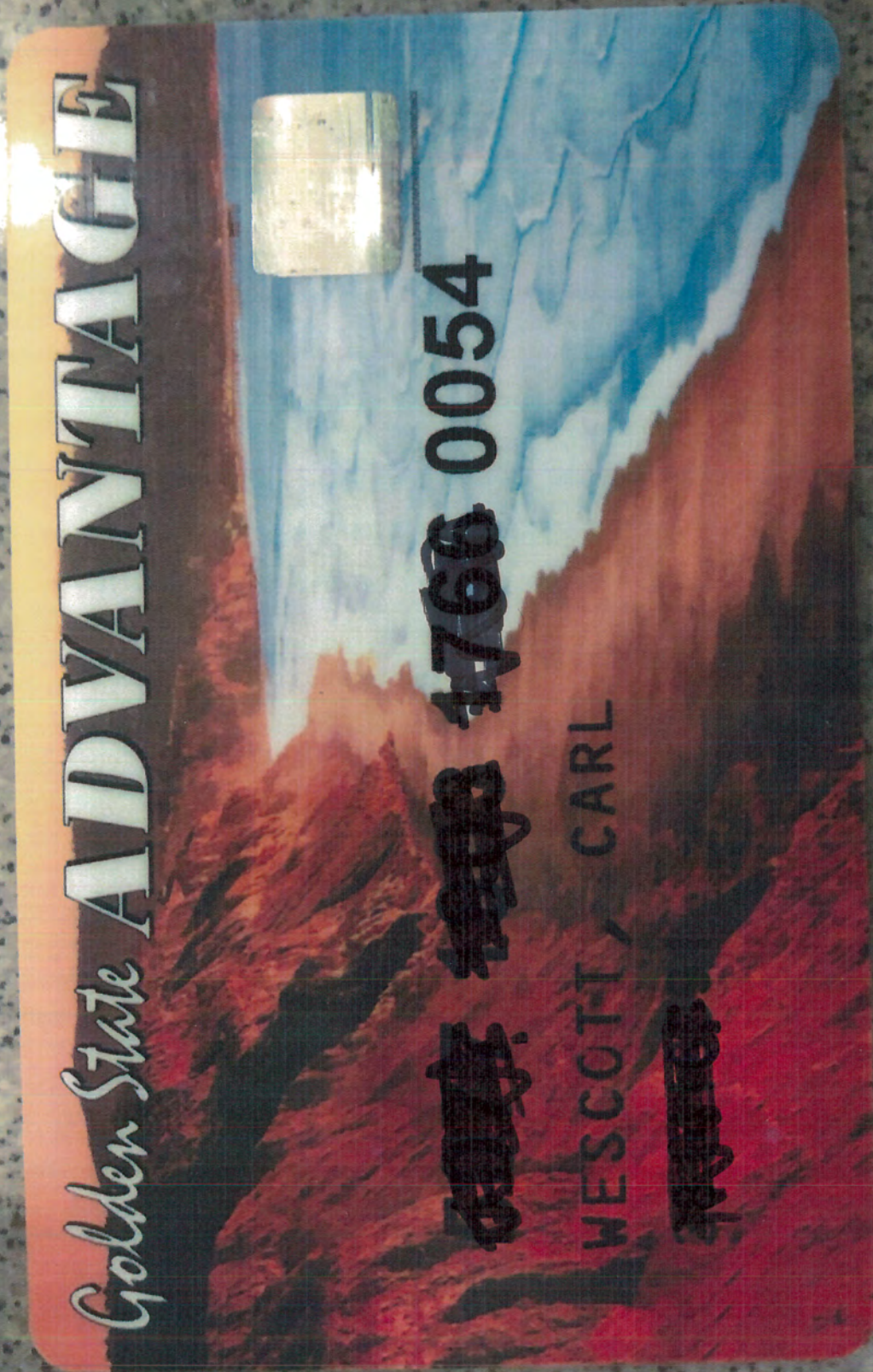
David Zeff

From: Carl Wescott <carlwescott42@gmail.com>
Sent: Monday, June 17, 2019 7:27 PM
To: dmz@zefflaw.com; carlwescott42@gmail.com
Subject: Carl Wescott EBT card -current
Attachments: IMG_2342.jpg; Untitled attachment 00006.txt



Follow Up Flag: Follow up
Flag Status: Flagged


Mr Zeff:



David Zeff

From: Carl Wescott <carlawescottiii@gmail.com> 
Sent: Monday, June 17, 2019 7:28 PM
To: dmz@zefflaw.com 
Subject: Fwd: Your SAR-7 has been submitted to San Francisco County

Follow Up Flag: Follow up
Flag Status: Flagged

Shows EBT is current. —CAW 

Telepathically sent to Siri who hopefully got it right.

Begin forwarded message:

From: GetCalFresh <hello@getcalfresh.org>
Date: June 7, 2019 at 12:54:34 PM PDT
To: carlawescottiii@gmail.com
Subject: Your SAR-7 has been submitted to San Francisco County

Hello,

We have successfully submitted your SAR 7 to San Francisco county!

If anything is missing, your county will contact you.

The GetCalFresh Team

[Unsubscribe](#)



EXHIBIT 3

Cooley

Joshua E. Elefant
+1 650 843 5572
jelefant@cooley.com

Via FedEx

July 9, 2019

David M. Zeff
Law Offices of David M. Zeff
1100 Larkspur Landing Circle, Suite 350
Larkspur, CA 94939

Re: *Fiechter, et al. v. Wescott*, San Francisco Superior Court Case No. CPF-11-511547

Dear Mr. Zeff:

Please find enclosed an amended document production to replace the documents previously produced by SparkLabs Management, LLC ("SparkLabs") as SPARKLABS000001-000006 in response to the third party subpoena issued to SparkLabs by your office in the above-referenced matter.

Sincerely,



Joshua E. Elefant

JEE/lo

Enclosures

207663241 v1

RECEIVED JUL 10 2019

1 COOLEY LLP
LESLIE V. CANCEL (160652)
2 (LCANCEL@COOLEY.COM)
JOSHUA E. ELEFANT (312913)
3 (JELEFANT@COOLEY.COM)
3175 Hanover Street
4 Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
5 Facsimile: (650) 849-7400

6 Attorneys for Third Party
SPARKLABS MANAGEMENT, LLC
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN FRANCISCO
10

11
12 FREDERICK C. FIECHTER, et al.,

13 Plaintiffs,

14 v.

15 CARL WESCOTT,

16 Defendant.
17

No. CPF-11-511547

DECLARATION OF RECORDS
CUSTODIAN

18
19 I, Bernard Moon, certify and declare as follows:

- 20 1. I am over the age of 18 years and not a party to this action.
21 2. My business address is 3587 Lupine Avenue, Palo Alto, CA 94303.
22 3. I am Manager at SparkLabs Management, LLC and SparkLabs Global Ventures
23 Management LLC.
24 4. I am the duly authorized custodian of the following described business records:
25 documents concerning any past or present property interest Carl Wescott, aka Kalle Wescott, has
26 or claims to have in SparkLabs, as well as any payments or other things of value from Carl Wescott
27 or paid to Carl Wescott, or anyone acting on his behalf.
28 5. The copies provided are true copies of all the records responsive to the subpoena,

1 subject to SparkLabs' reasonable limitation with respect to scope, except for the confidential
2 information that has been redacted.

3 6. The documents transmitted herewith are copies of business records and were
4 prepared by the personnel of SparkLabs in the ordinary course of business at or near the time of the
5 act, condition, or event.

6
7 I declare under penalty of perjury under the laws of the State of California that the foregoing
8 is true and correct and that this Declaration is executed on July 8, 2019 at Palo Alto,
9 California.

10
11
12 
13 BERNARD MOON
14
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18
19
20
21
22
23
24
25
26
27
28

----- Original Message -----

From: Bernard Moon <bernard@sparklabsglobal.com>
To: "Carl A. Wescott" <C@carlawescott.com>
Date: August 8, 2017 at 5:22 AM
Subject: Managing Partner Role for Sparklabs IoT

Carl,

It would be awesome if you would come on board as the Managing Partner for Sparklabs IoT. I already discuss this with [REDACTED] and [REDACTED], and will soon with [REDACTED] but we know that he will agree. At this time, I would be discrete and not disclose to [REDACTED] when you see him next week. Unless [REDACTED] informs you otherwise.

Your salary I assume will be at least \$150,000/year. Small at a minimum, but can increase depending on the amount that is raised and what we plan for the yearly budget.

As for your carried interest, this is the confidential but original allocation:

[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
3.0%	Carl Wescott

100.0%	

We want to credit [REDACTED] with some of his carry for the 1st year, so we will let him retain 3% vs. 9%. I assume you basically don't need an engineering director. Maybe you might need a junior or mid-level hardware engineer, so you might have to allocate him some of your carry. We can discuss if things need to be shifted around. Here is the new carry distribution with you getting 37%:

37.0%	Carl Wescott
100.0%	

As you know, this is the carry allocation for the 20% profit we will receive after all the principal is paid back. Let me know if you have any questions and I'll see you soon. Thanks!

Bernard

----- Forwarded message -----

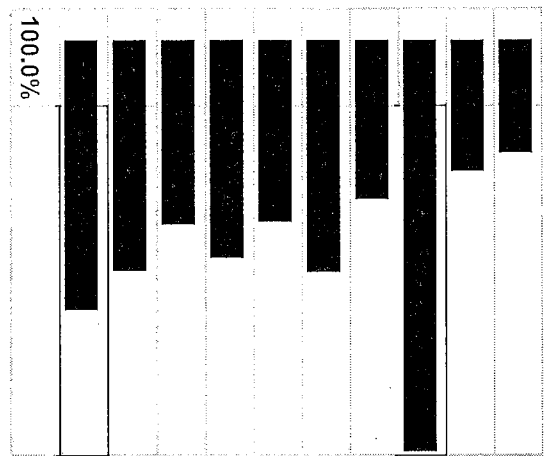
From: **Bernard Moon** <bernard@sparklabsglobal.com>
Date: Sun, Nov 11, 2018 at 5:44 PM
Subject: Carried Interest Changes for SparkLabs IoT
To: Carl Wescott <carl@sparklabsiot.com>
Cc: eugene <eugene@sparklabs.co.kr>

So I lowered the founding partners from █% to █%. Lowered Carl & Team from 44% to 42%. Then allocated █% to █, which hopefully they will accept.

Some other minor changes, such as allocating █% for the advisors since I think it's better for them to feel appreciated. Let me know if you are good with this. Thanks!

Bernard

42.0%	Carl Wescott & Team
█	
█	
█	
█	
█	
█	
█	



PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of California. I am employed in Santa Clara County, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of 18 years and not a party to this action. My business address is Cooley LLP, 3175 Hanover Street, Palo Alto, California 94304-1130. My e-mail address is lodell@cooley.com. On July 9, 2019, I served the following documents on the parties listed below in the manner(s) indicated:

1. **DECLARATION OF RECORDS CUSTODIAN;**
2. **BATES LABELED DOCUMENT NOS. SPARKLABS000001-SPARKLABS000006**

- ☐ (BY U.S. MAIL – CCP § 1013a(1)) I am familiar with the business practice of Cooley LLP for collection and processing of correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.
- ☐ (BY MESSENGER SERVICE – CCP § 1011) I consigned the document(s) to an authorized courier and/or process server for hand delivery on this date.
- ☐ (BY FACSIMILE – CCP § 1013(e)) I am personally and readily familiar with the business practice of Cooley LLP for collection and processing of document(s) to be transmitted by facsimile and I caused such document(s) on this date to be transmitted by facsimile to the offices of addressee(s) at the numbers listed below.
- ☒ (BY OVERNIGHT MAIL – CCP § 1013(c)) I am personally and readily familiar with the business practice of Cooley LLP for collection and processing of correspondence for overnight delivery, and I caused such document(s) described herein to be deposited for delivery to a facility regularly maintained by Delivery Service for overnight delivery.
- ☐ (BY ELECTRONIC MAIL – CCP § 1010.6(a)(4)(A)) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused such documents described herein to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

See Service List

///

///

///

///

1 *Service List:*

2 David M. Zeff
3 Law Offices of David M. Zeff
4 1100 Larkspur Landing Circle
5 Suite 350
6 Larkspur, CA 94939-1809
7 Via FedEx Overnight Mail

8 I declare under penalty of perjury under the laws of the State of California that the above is
9 true and correct.

10 Executed on July 9, 2019, at Palo Alto, California.

11 
12 _____
13 Lori L. O'Dell

EXHIBIT 4

Carl Wescott Paypal - Credit Transactions

Platform	Created Date	CR	Counterparty Name	Counterparty Email
PAYPAL	07-04-2018 17:05:55	\$25.00	Andrew Swett	aswett07@gmail.com
PAYPAL	10-04-2018 16:04:41	\$210.00	Angela Ha	ha.angela@yahoo.com
PAYPAL	06-17-2018 09:30:40	\$500.00	Anthony Turino	anthonyturino@gmail.com
PAYPAL	06-17-2018 09:30:40	\$500.00	Anthony Turino	anthonyturino@gmail.com
PAYPAL	08-08-2018 16:43:53	\$131.00	Anthony Turino	anthonyturino@gmail.com
PAYPAL	08-08-2018 18:29:31	\$131.00	Anthony Turino	anthonyturino@gmail.com
PAYPAL	09-20-2018 17:25:22	\$3,500.00	Anthony Turino	anthonyturino@gmail.com
PAYPAL	11-27-2018 17:59:46	\$200.00	Anthony Turino	anthonyturino@gmail.com
PAYPAL	02-10-2019 12:27:53	\$23.00	Anthony Turino	anthonyturino@gmail.com
				\$4,985.00
PAYPAL	11-01-2017 14:08:06	\$79.99	B&H Foto & Electronics Corp.	paypal@bhphotovideo.com
PAYPAL	02-20-2019 19:34:22	\$855.00	Bernard Moon	bernard@sparklabsglobal.com
PAYPAL	03-18-2019 12:03:31	\$1,100.00	Bernard Moon	bernard@sparklabsglobal.com
PAYPAL	04-14-2019 23:53:56	\$1,541.66	Bernard Moon	bernard@sparklabsglobal.com
				\$3,496.66
PAYPAL	01-05-2019 13:30:06	\$36.00	catherine lee	videovision_cml@yahoo.com
PAYPAL	08-15-2018 10:38:06	\$1,000.00	Daniel Anderson	danandersonmobile@yahoo.com
				\$1,000.00
PAYPAL	09-17-2017 07:30:38	\$54.00	Elite Snowboard Services	jaytierney@hotmail.com
PAYPAL	09-13-2017 14:46:00	\$63.00	Henry Heikkinen	henryh@livefunk.com
PAYPAL	09-26-2018 21:55:52	\$60.00	Henry Petras	henrypetras@hotmail.com
PAYPAL	10-06-2017 17:56:36	\$23.97	Jenny Phu	jennyphu@gmail.com
PAYPAL	01-26-2018 14:43:55	\$200.00	Jeremy Kee	jeremykeecorp@gmail.com
PAYPAL	01-21-2019 10:16:34	\$20.00	Jeremy Kee	jeremykeecorp@gmail.com
PAYPAL	02-26-2019 11:15:10	\$291.00	John Cashman	jcashman09@gmail.com
PAYPAL	11-29-2017 18:22:33	\$175.00	Jonas Goodman	jonasgoodman@gmail.com
PAYPAL	12-19-2017 13:07:51	\$200.00	Jonas Goodman	jonasgoodman@gmail.com
PAYPAL	01-24-2018 13:01:45	\$100.00	Jonas Goodman	jonasgoodman@gmail.com
PAYPAL	05-24-2018 14:44:16	\$85.00	Jonas Goodman	jonasgoodman@gmail.com
PAYPAL	05-29-2018 22:50:09	\$100.00	Jonas Goodman	jonasgoodman@gmail.com
PAYPAL	06-02-2018 00:39:25	\$50.00	Jonas Goodman	jonasgoodman@gmail.com
PAYPAL	01-07-2019 19:44:51	\$1,062.50	Jonas Goodman	jonasgoodman@gmail.com
				\$1,772.50
PAYPAL	08-26-2018 22:41:19	\$71.00	Jonathan Cifuentes	cifuentj@gmail.com
PAYPAL	07-28-2018 16:51:13	\$162.00	Laurie Etheridge	laurieetheridge@yahoo.com
PAYPAL	08-15-2018 11:35:09	\$1,000.00	Michael Shea	chetvancouver@yahoo.com
PAYPAL	08-29-2018 20:13:57	\$1,500.00	Michael Shea	chetvancouver@yahoo.com
				\$2,500.00
PAYPAL	06-27-2018 23:02:09	\$1,000.00	Nicole Wescott	notnicoleagain@hotmail.com
PAYPAL	06-28-2018 19:54:11	\$1,000.00	Nicole Wescott	notnicoleagain@hotmail.com
				\$2,000.00
PAYPAL	10-19-2017 15:24:07	\$1.00	Olga Africawala	savoaf@yahoo.com
PAYPAL	04-22-2018 21:41:03	\$266.00	Olga Africawala	savoaf@yahoo.com
PAYPAL	04-22-2018 21:41:22	\$50.00	Olga Africawala	savoaf@yahoo.com
PAYPAL	06-17-2018 19:08:21	\$50.00	Olga Africawala	savoaf@yahoo.com
PAYPAL	08-15-2018 10:24:29	\$100.00	Olga Africawala	savoaf@yahoo.com
PAYPAL	09-30-2018 18:47:28	\$42.00	Olga Africawala	savoaf@yahoo.com
				\$509.00
PAYPAL	08-08-2018 18:58:57	\$50.00	peter koufis' Store	peterck@greenerlatitudes.com
PAYPAL	08-08-2018 18:58:57	\$50.00	peter koufis' Store	peterck@greenerlatitudes.com
PAYPAL	08-09-2018 14:22:20	\$50.00	peter koufis' Store	peterck@greenerlatitudes.com
PAYPAL	09-25-2018 18:43:11	\$85.00	Raman Frey	ramanfrey@gmail.com
PAYPAL	04-26-2019 16:59:36	\$147.00	randy vogel	randy@ntth.com

Carl Wescott Paypal - Credit Transactions

PAYPAL	03-05-2018 13:43:18	\$25.00 Rene Torres	rtorresphd@hotmail.com
PAYPAL	07-10-2018 17:15:33	\$25.00 robert block	rjbrjb1@gmail.com
PAYPAL	08-09-2018 16:35:05	\$200.00 robert block	rjbrjb1@gmail.com
PAYPAL	09-25-2018 12:07:49	\$100.00 robert block	rjbrjb1@gmail.com
PAYPAL	09-25-2018 15:57:01	\$300.00 robert block	rjbrjb1@gmail.com
PAYPAL	10-06-2018 15:16:22	\$100.00 robert block	rjbrjb1@gmail.com
			\$725.00
PAYPAL	03-21-2018 21:42:07	\$45.00 Shannel Busuioc	shannelb-10@sandiego.edu
PAYPAL	11-07-2018 09:31:37	\$500.00 Shelley Alger Photography	shelleyalger@gmail.com
PAYPAL	01-14-2019 11:30:46	\$67.00 Trent Clingan	thclingan13@gmail.com
PAYPAL	10-19-2017 12:10:20	\$1,500.00 William Russ	texfix@toast.net
PAYPAL	11-22-2017 12:31:32	\$1,000.00 William Russ	texfix@toast.net
PAYPAL	11-30-2017 09:58:57	\$1,000.00 William Russ	texfix@toast.net
PAYPAL	12-06-2017 14:45:55	\$2,000.00 William Russ	texfix@toast.net
PAYPAL	12-15-2017 07:33:10	\$2,630.00 William Russ	texfix@toast.net
PAYPAL	01-03-2018 11:16:03	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	01-16-2018 11:48:05	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	02-01-2018 15:43:07	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	02-15-2018 07:50:04	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	03-05-2018 12:01:20	\$1,000.00 William Russ	texfix@toast.net
PAYPAL	03-07-2018 09:12:21	\$1,000.00 William Russ	texfix@toast.net
PAYPAL	03-08-2018 13:50:50	\$500.00 William Russ	texfix@toast.net
PAYPAL	03-16-2018 11:07:40	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	04-03-2018 13:26:50	\$1,000.00 William Russ	texfix@toast.net
PAYPAL	04-09-2018 07:02:16	\$1,500.00 William Russ	texfix@toast.net
PAYPAL	04-17-2018 01:51:23	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	05-04-2018 13:21:50	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	05-17-2018 12:34:09	\$1,000.00 William Russ	texfix@toast.net
PAYPAL	05-20-2018 11:15:13	\$1,000.00 William Russ	texfix@toast.net
PAYPAL	05-29-2018 19:37:09	\$500.00 William Russ	texfix@toast.net
PAYPAL	05-31-2018 17:06:06	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	06-15-2018 09:35:58	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	07-02-2018 11:31:36	\$1,250.00 William Russ	texfix@toast.net
PAYPAL	07-05-2018 20:27:30	\$1,250.00 William Russ	texfix@toast.net
PAYPAL	07-16-2018 08:34:49	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	08-01-2018 14:10:19	\$2,000.00 William Russ	texfix@toast.net
PAYPAL	08-06-2018 12:34:38	\$500.00 William Russ	texfix@toast.net
PAYPAL	08-16-2018 07:11:13	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	09-03-2018 20:00:25	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	09-12-2018 14:27:40	\$1,250.00 William Russ	texfix@toast.net
PAYPAL	09-18-2018 10:32:15	\$1,250.00 William Russ	texfix@toast.net
PAYPAL	10-09-2018 14:57:09	\$1,000.00 William Russ	texfix@toast.net
PAYPAL	10-16-2018 12:46:29	\$2,000.00 William Russ	texfix@toast.net
PAYPAL	10-22-2018 16:51:30	\$2,000.00 William Russ	texfix@toast.net
PAYPAL	11-02-2018 13:18:47	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	11-16-2018 18:52:31	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	12-03-2018 11:33:55	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	12-17-2018 14:47:04	\$2,500.00 William Russ	texfix@toast.net
PAYPAL	12-22-2018 18:56:32	\$400.00 William Russ	texfix@toast.net
PAYPAL	01-03-2019 17:02:11	\$1,500.00 William Russ	texfix@toast.net
PAYPAL	01-14-2019 11:49:10	\$200.00 William Russ	texasfixtures@gmail.com
PAYPAL	01-17-2019 19:52:47	\$300.00 William Russ	texasfixtures@gmail.com
PAYPAL	01-19-2019 18:25:04	\$800.00 William Russ	texasfixtures@gmail.com
			\$71,330.00
PAYPAL	10-06-2017 21:41:58	\$30.63	
PAYPAL	10-09-2017 20:24:25	\$5.55	
PAYPAL	10-09-2017 20:24:25	\$25.63	
PAYPAL	10-09-2017 20:32:54	\$129.99	
PAYPAL	10-21-2017 03:06:13	\$737.69	
PAYPAL	10-28-2017 15:02:55	\$170.00	
PAYPAL	10-29-2017 17:00:49	\$1.00	
PAYPAL	12-12-2017 15:50:20	\$31.91	
PAYPAL	02-06-2018 09:27:07	\$15.00	
PAYPAL	04-26-2018 05:17:03	\$0.19	
PAYPAL	04-26-2018 05:17:24	\$222.22	
PAYPAL	02-09-2019 02:11:37	\$48.55	
PAYPAL	02-26-2019 06:02:23	\$81.12	
PAYPAL	03-13-2019 07:43:47	\$137.71	
PAYPAL	03-13-2019 07:43:47	\$104.79	
PAYPAL	03-20-2019 23:19:54	\$106.90	
PAYPAL	04-16-2019 12:42:25	\$260.52	

\$92,742.52 TOTAL CREDIT TRANSACTIONS

EXHIBIT 5

David Zeff

From: Robert J. Block <rjbrjb1@gmail.com>
Sent: Wednesday, August 07, 2019 8:52 AM
To: David Zeff
Subject: Wescott

He is within about a week or a little less receiving \$50,000. Would that be of interest? We would need to move with alacrity. The putative payor has paid me directly on his instructions.

Let me know, thx.

773-571-5446

EXHIBIT 6

David Zeff

From: Robert J. Block <rjbrjb1@gmail.com>
Sent: Wednesday, August 07, 2019 9:11 AM
To: David Zeff
Subject: Fwd: acct number is 325074917914

Has the corporate name. Did you ever check this out? I believe he's using the same account though I may be mistaken. He keeps a couple hundred to a couple Grand in there at a time.

----- Forwarded message -----

From: Carl A. Wescott <c@carlawescott.com>
Date: Sun, May 20, 2018, 9:51 PM
Subject: acct number is 325074917914
To: <rjbrjb1@gmail.com>

B of A

Side Coast Inc (small business account in california)

325074917914

EXHIBIT 7

David Zeff

From: Robert J. Block <rjbrjb1@gmail.com>
Sent: Thursday, August 08, 2019 1:50 PM
To: David Zeff
Subject: Fwd: basic facts and legal reasoning on the US \$50k

Mr. Zeff:

First of all, confirming: I have no professional or personal obligation of confidentiality to Mr. Wescott.

What is most interesting in this chain is the self-serving June 19, 2019 email from Moon to Wescott (third email down). Moon acknowledges that your client and Monette have filed writs of attachment. He proposes paying Carl \$50K in a manner calculated to evade those writs. I think that is inculpatory. Nor do I believe a Judge will credit Moon's posturing that the payment is from altruistic motives. You're the expert but a Court may find the communication to be irregular, suggestive and redolent of bad faith.

I will see what other nuggets I can excavate in the morning. I recalled this one off the top of my head because it was so ill-advised.

Thx for your call.

----- Forwarded message -----

From: Carl Wescott <carlwescott42@gmail.com>
Date: Fri, Jun 21, 2019, 6:02 PM
Subject: Fwd: basic facts and legal reasoning on the US \$50k
To: Robert J. Block <RjbRjb1@gmail.com>

Telepathically sent to Siri who hopefully got it right.

Begin forwarded message:

From: Bernard Moon <bernard@sparklabsglobal.com>
Date: June 20, 2019 at 1:49:11 PM PDT
To: Carl Wescott <carl@sparklabsiot.com>
Cc: Carl Wescott <carlwescott42@gmail.com>, Carl A Wescott <carlawescottiii@gmail.com>, Jimmy Kim <jimmy@sparklabsglobal.com>
Subject: Re: basic facts and legal reasoning on the US \$50k

Carl,

Per my prior email – your association with SparkLabs has ended. You are not to do any work on SparkLabs' behalf. Do not attend Demo Day. We are “disinviting” you.

Bernard

On Thu, Jun 20, 2019 at 10:47 AM Carl Wescott <carl@sparklabsiot.com> wrote:
Bernard,

Thanks for getting back to me.

As per prior communications, I plan to resign from my SparkLabs job and from the partnership in early July, as that is when you indicated (at one point) that the \$50,000 could or would (likely) be paid. Once those monies are in hand, I will resign and focus on getting a new safe/secure place to live and/or work and starting my new life. (Yes, very repetitive).

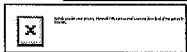
If it takes longer to pay, then I will resign when paid that US \$50,000. Since I cannot work on SparkLabs IoT, I will continue to carry out other tasks and projects for the next couple or three weeks until I get this payment. Among other promised deliverables, I'm still going to complete the Singapore writeup, and I'll finally have the time post-Seoul (if not paid by then) to use my rolodex to fill out mentors at some of the new accelerators (long list for DC, for example).

My housing and other issues that have been outstanding for years are simply a matter of money. I already have a plane ticket to Seoul and a hotel for Monday through Friday, and two other nights of hotels. As per Dr. Jo's request, I am speaking at Inha University on June 28th, and I still plan to do this. I'm still planning to attend Demo Day and related events that I'm registered for and was invited to (and obviously will not be discussing any of these issues with anyone). As you know, it's been my plan to attend these Demo Day events for the last time as an "insider", and then to resign in early July after getting this \$50,000. If you're specifically disinviting me from attending Demo Day, please let me know.

CAW

--

Carl A. Wescott
+1 415 335 5000
Email: carl@sparklabsiot.com
URL: www.sparklabsiot.com



On Wed, Jun 19, 2019 at 7:57 PM Bernard Moon <bernard@sparklabsglobal.com> wrote:

Carl,

Jimmy forwarded to your below email to me. Given Jimmy's family situation, I will reply for both of us.

We are having multiple email exchange with you about the same topics, often repeating things that were previously said or addressing comments from you that seem to ignore what was said earlier.

On June 7th, Jimmy sent you an email confirming that you should stop all SparkLabs activity, and that you should proceed with your proposed "resignation." Since you don't have a formal role with the organization, we did not think any formal resignation or transition process was needed. Jimmy only asked that you show us the resignation message you planned to send out, so that we were comfortable with your proposed messaging.

Nothing has changed since that email was sent. In your latest email you say, "I can understand why Bernard and you no longer wish me to be part of the SparkLabs team (if that's true)." With all due respect to you, it is true. We do not think your continued involvement with SparkLabs is appropriate given the circumstances. Given that decision, you should not come to Seoul or do any more work on behalf of SparkLabs. As Jimmy mentioned in his June 7th email, you should focus on resolving your family, financial and housing issues and he just reiterated this to me again.

With respect to the consulting fee, we do not believe you are legally entitled to any money. We proposed giving you some money to help you out, if certain business conditions were met. We will still willing to provide you with the \$50K consulting fee discussed out of goodwill, but (A) it needs to be documented in a way so that it resolves all SparkLabs claims for money you have, and (B) you need to take steps that would allow us to pay you these funds directly. Right now, the SparkLabs entities and myself personally (this past Friday) have been served with writs of attachment directing us to send any money payable to Monette (to satisfy the judgment she had) and to Fiechter (to satisfy that judgment).

We strongly reject with your contention that there was any "oral contract" or any other agreement to pay you funds for investor referrals or for any other services. We told you several times that you could not receive any referral fees as that would be prohibited transaction based compensation (since you do not have a broker dealer license). Our understanding was that you would get carry and be admitted as a Managing Partner when and if SparkLabs IoT's fundraising was successfully completed. That has not happened.

Your latest email is extremely troubling. In addition to raising a number of threatened legal claims, you are blaming SparkLabs for your personal difficulties (homelessness, use of food stamps, inability to visit with your children) which we have not had any visibility on or control over. We were not even aware of the depth of your financial troubles until recently. At various points in the past you told us that you would be securing another job, and we never prevented or discouraged you from doing so.

If you would like to propose a way resolving this matter fully and fairly, please do so. In the meantime, you should not represent that you are a SparkLabs representative in any business discussions you may be having, and should change your LinkedIn and other professional materials to reflect that your involvement with SparkLabs ended.

Respectfully,

Bernard

2019년 6월 19일 (수) 오전 5:44, Carl Wescott <carlawescottiii@gmail.com>님이 작성:

Jimmy, I don't want to bother or upset Bernard on his birthday, so sending to you only.

I will forward to Bernard tomorrow.

After years of oral and written promises that I thought I could rely on (and I believe ARE legally binding), I have heard from both you and Bernard that you don't believe there is any legal basis to compensate me or pay me, and thus I am setting out the basic facts and legal reasoning for your review.

As you know, years ago (perhaps 2015 or 2016, will look it up) Bernard, as agent for SparkLabs and partner thereof, offered me 5% (\$50,000 per \$1 million raised) for referrals to investors that SparkLabs closed. Oral contract formed. Offer, acceptance, meeting of the minds.

I then did more than refer. I took John Lee to lunch (part of the consideration, a legal term relating to the original oral contract), found out the details of his venture fund within MLB, advised him a bit on it on some other investments, and recommended SparkLabs. MLB then invested an eight-digit amount, including US \$1 mil to SparkLabs. Highly confidential as you know. I know the other details on US \$20+ mil more but cannot divulge due to NDA.

But rather than pay the \$50,000, Bernard suggested we deepen the relationship, and that I become a Venture Partner in SparkLabs IoT. I will have to look up what % of the carry I was to get; I think it was 3%. Though nothing was guaranteed, based on SparkLabs IoT being funded and making 16 investments with many more to come, I was to reasonably expect much more than US \$50,000 over time.

It was only later that I discovered that SparkLabs IoT was NOT funded and in fact the 16 investments trumpeted as SparkLabs IoT in press releases and on the web site were made by a different entity. This is the reason I have suggested a new clean entity if SparkLabs IoT is going to continue, though that is more related to the job I was offered in 2016 and not the consulting I was to be paid for before. Continuing on, another idea is just to shut it down. I offered to raise an IoT accelerator fund in Singapore (and Bernard thinks a FinTech one there is a better idea. I agree that both should be viable and have written up some details and can continue to refine the writeup and concept if we have interest).

If I were to file a lawsuit over this issue, the way the law works in the US is that I would get:

- 1) 10% interest compounded from the date I was supposed to originally get paid (2015?)
- 2) *if* fraud is proven, I would get triple damages on top of the interest-adjusted number. I'm pretty sure that the civil torts of promissory fraud, and state and federal securities fraud, among other types of fraud, would apply. Essentially I purchased a security (a share in SparkLabs IoT) based on false information, with the \$50,000 I should have received. Was SparkLabs IoT actually funded? Did it make those 16 investments? Did it reasonably expect to generate the expected cash flow? I refer your attention to US Securities and Exchange Commission Rule 10b-5, codified at 17 C.F.R. 240.10b-5, part of the Securities Exchange Act of 1934, which prohibits any act or omission resulting in deceit relating to the sale of any security. I'll go ahead and draft the complaint for your review. I have no plans to file it. I simply want you to look at it, and if you check with Cooley LLP they will confirm that we do have issues and legal obligations.
- 3) It's likely I would get exemplary/punitive damages as well, given the impact on my life from 2015 through late 2016 and beyond, where I did not get a place to live, have not paid child support, could not afford to hire an attorney so I could see my children. These damages would help adjust for the secondary impact of these issues as well as are meant to deter the tortfeasors from similar behavior in the future.

Based on conversations with Bernard, where I pointed out that my original share of SparkLabs IoT was NOT what it was supposed to be, and that I had not gotten paid, he had promised to make things right, starting with the original \$50,000, and with promises to pay of that \$50,000 (most recently, prior to new offer, in January when I was bringing in an investment by Randy Russ).

I have been extremely patient for years. I have been a team player and good soldier. I have made incredible sacrifices on behalf of Bernard, you, and SparkLabs, remaining homeless, on food stamps, not living the lifestyle I should have, not seeing my children, not traveling or dating for the most part outside of some SparkLabs business and a few other sponsored trips.

I do not want to cause issues. I do not want to fight. I simply seek a fair resolution of my issues. Can we please talk about this soon and figure out how to handle this? If you are no longer going to pay the newly promised \$50,000, can you please advise as soon as possible?

Right now I'm just trying to get part of the original \$50,000. I have been told that SparkLabs grew too quickly and capital was being raised too slowly and that I cannot get paid.

Thus, if SparkLabs still can't afford to pay the US \$50k, and partners cannot cover, perhaps we can do something like this:

I'd like to get \$5k wired to Capital Ideas Inc. from Korea in the next day or so (but can survive with \$2k). It can also be wired to me or to Side Coast Inc. I don't have a personal bank account but can set one up. It can be wired from elsewhere.

I'd like to get \$20k wired to Capital Ideas Inc from Korea on July 4th, the first \$9k so I can get a safe, secure place to live, and another \$10k for an attorney so I can see my children (or perhaps \$6k of that for a Child Support payment if that will do the trick). It would be better to get \$9k of it earlier so I can lock in my place to live and work. I prefer to lock it in this week, sign a lease starting July 5th, and move starting July 5th.

I'm open to ideas.

Again, if we're no longer going to pay me, please advise ASAP, thanks.

Otherwise, I'd like to work something out on the logistics and timing and am very open to possibilities.

Finally, we need to work through these issues, but I still think highly of Bernard, you, the rest of the team, and the whole SparkLabs ecosystem. I have been honored to be a small part of our success (ironically, more as a mentor than in other roles). I can understand why Bernard and you no longer wish me to be part of the SparkLabs team (if that's true). I fully admit that issues related to where I have had to live and work, in the worst part of San Francisco where crime is rampant, have impacted my ability to perform.

I value our relationships. If and when there is interest, perhaps in the future, I would like to work on some cool projects that are not tainted by these sorts of issues where we are able to succeed together.

--Carl +1 415 335 5000

EXHIBIT 8

David Zeff

From: Robert J. Block <rjbrjb1@gmail.com>
Sent: Thursday, August 08, 2019 2:11 PM
To: David Zeff
Subject: Fwd: subpoena response put together by Cooley and signed by Bernard, that went to LVS
Attachments: Third-Party SparkLabs Objections and Responses to Subpoena .pdf; SparkLabs Declaration of Records Custodian .pdf

Carl specifically alleges perjury in subpoena response.

----- Forwarded message -----

From: Carl Wescott <carlawescottiii@gmail.com>
Date: Tue, Jun 25, 2019, 2:49 AM
Subject: subpoena response put together by Cooley and signed by Bernard, that went to LVS
To: Robert J. Block <rjbrjb1@gmail.com>, Carl A Wescott <carlawescottiii@gmail.com>, Carl Wescott <carlwescott42@gmail.com>

Bernard commits perjury herein.

The only question is whether Cooley and Bernard/SparkLabs conspired to cover up my compensation, or whether Cooley is unaware.

--Carl

EXHIBIT 9

David Zeff

From: Robert J. Block <rjbrjb1@gmail.com>
Sent: Friday, August 09, 2019 10:58 AM
To: David Zeff
Subject: Re: acct number is 325074917914

To correct, my \$500 deposit was 5/20-21/18. That was the reason he sent the account number and Corp name in his 5/20/18 email.

On Fri, Aug 9, 2019, 12:53 PM Robert J. Block <rjbrjb1@gmail.com> wrote:

Carl Pay-Pals me. He paid the for a hotel room at the Clift last month using a debit card linked to this account. He routinely pays hotel expenses with that card. He paid a friend of mine 3-4X directly from this account and she PayPalled me (my bank is TCF with no branches convenient to Carl). I would rather not use her name.

Carl was stranded in Panama in June of 2018. He instructed me to deposit \$500 in this specific account. I did so and he used the money to get a hotel in Panama.

On Fri, Aug 9, 2019, 12:48 PM David Zeff <dmz@zefflaw.com> wrote:

Working on your declaration. Have you personally received money from Wescott via this account?

Do you know of others he has paid from this account?

From: Robert J. Block <rjbrjb1@gmail.com>
Sent: Wednesday, August 07, 2019 9:11 AM
To: David Zeff <dmz@zefflaw.com>
Subject: Fwd: acct number is 325074917914

Has the corporate name. Did you ever check this out? I believe he's using the same account though I may be mistaken. He keeps a couple hundred to a couple Grand in there at a time.

----- Forwarded message -----

From: Carl A. Wescott <c@carlawescott.com>
Date: Sun, May 20, 2018, 9:51 PM
Subject: acct number is 325074917914
To: <rjbrjb1@gmail.com>

B of A

Side Coast Inc (small business account in california)

325074917914

EXHIBIT 10

Additional Paypal Payments from Carl Wescott (c@carlawescott.com) to Robert Block (rjbrjb1@gmail.com)

Date	Details	Transaction ID	Amount
2/1/19	Payment from Carl Wescott	6UW3227066718150X	\$100.00
1/18/19	Payment from Carl Wescott	2W927861YA690510D	\$200.00
1/8/19	Payment from Carl Wescott	94S20351F6198990C	\$820.00
1/7/19	Payment from Carl Wescott	0TD75336HT1118709	\$180.00
1/4/19	Payment from Carl Wescott	018196887R773324H	\$150.00
12/30/18	Payment from Carl Wescott	43S08491A5686532L	\$400.00
12/19/18	Payment from Carl Wescott	37S54650UR4804445	\$1,000.00
12/17/18	Payment from Carl Wescott	14T093163B765950T	\$920.00
12/16/18	Payment from Carl Wescott	10U670354B6946158	\$80.00
12/3/18	Payment from Carl Wescott	9V0633222X0141713	\$2,000.00
11/27/18	Payment from Carl Wescott	7C785516T9225764F	\$200.00
11/16/18	Payment from Carl Wescott	6A4961701Y6091134	\$1,500.00
11/16/18	Payment from Carl Wescott	9P603085H18437121	\$30.00
11/7/18	Payment from Carl Wescott	3HP51979DG300102Y	\$500.00
11/3/18	Payment from Carl Wescott	3M412077F08735026	\$500.00
11/2/18	Payment from Carl Wescott	1TP70126B90427800	\$1,000.00
11/1/18	Payment from Carl Wescott	8UC18018L5259892K	\$40.00
10/24/18	Payment from Carl Wescott	68U30285S01667056	\$25.00
10/22/18	Payment from Carl Wescott	97N67670FY3872525	\$875.00
10/22/18	Payment from Carl Wescott	9JA97119BU1499016	\$6.00
10/22/18	Payment from Carl Wescott	378736247U767832V	\$94.00
10/16/18	Payment from Carl Wescott	2B719442T1882721P	\$1,000.00
10/9/18	Payment from Carl Wescott	5PG60002BK0893457	\$3.20
10/9/18	Payment from Carl Wescott	93843925B5807474K	\$100.00
9/23/18	Payment from Carl Wescott	3C840608EX9359606	\$1,000.00
9/20/18	Payment from Carl Wescott	1JT45106YT640820N	\$1,000.00
9/18/18	Payment from Carl Wescott	06V34712AN107452W	\$1,000.00
9/4/17	Payment from Carl Wescott	8DX23753SG159040P	\$1,000.00
9/2/18	Payment from Carl Wescott	6AD905111R9535147	\$1,000.00
8/17/18	Payment from Carl Wescott	5GB49390GV2299353	\$1,000.00
8/16/18	Payment from Carl Wescott	6XU47878JD375980B	\$206.90
8/15/18	Payment from Carl Wescott	10T23888M41723932	\$1,000.00
8/6/18	Payment from Carl Wescott	6D428106FK502644B	\$13.76
8/6/18	Payment from Carl Wescott	2T363366HC1772618	\$500.25
8/1/18	Payment from Carl Wescott	5JS629987D7804339	\$1,825.00
7/31/18	Payment from Carl Wescott	4VR81564TN445173P	\$100.00
7/18/18	Payment from Carl Wescott	40C15231UV6484355	\$25.00
7/16/18	Payment from Carl Wescott	4JK389886H3904146	\$2,000.00
7/5/18	Payment from Carl Wescott	5B044537FY546150E	\$1,000.00
7/2/18	Payment from Carl Wescott	89H80607AG373064N	\$1,000.00
6/28/18	Payment from Carl Wescott	5MS275625W730000V	\$500.00
6/28/18	Payment from Carl Wescott	49N94438DD674703U	\$500.00
6/20/18	Payment from Carl Wescott	54X51581FP661370B	\$50.00
6/15/18	Payment from Carl Wescott	5ET995422J8045500	\$1,000.00
6/2/18	Payment from Carl Wescott	3UG452349J5070110	\$24.50
6/1/18	Payment from Carl Wescott	6WR62578U8365745H	\$1,500.00
5/20/18	Payment from Carl Wescott	5DM95493BU806574G	\$500.00

5/20/18	Payment from Carl Wescott	0420703248179403G	\$200.00
5/17/18	Payment from Carl Wescott	6S810480VF4668928	\$800.00
5/7/18	Payment from Carl Wescott	0ED92294GW921652X	\$1,000.00
5/1/18	Payment from Carl Wescott	29691591P6105760A	\$500.00
4/27/18	Payment from Carl Wescott	13G511072P1186721	\$54.00
4/27/18	Payment from Carl Wescott	0H399003RG266512D	\$246.00
4/17/18	Payment from Carl Wescott	1J198158W12086242	\$1,500.00
4/16/18	Payment from Carl Wescott	0TC05403F7749505P	\$500.00
4/9/18	Payment from Carl Wescott	58M63909448441738	\$1,000.00
4/3/18	Payment from Carl Wescott	1UB5576700844774F	\$1,000.00
3/16/18	Payment from Carl Wescott	2V072388GM5394836	\$1,650.00
3/7/18	Payment from Carl Wescott	5G724471VC7358925	\$475.00
3/5/18	Payment from Carl Wescott	9GU715996S577221G	\$25.00
3/5/18	Payment from Carl Wescott	2P1528796A371970W	\$1,000.00
2/15/18	Payment from Carl Wescott	823490709C728121X	\$1,000.00
2/1/18	Payment from Carl Wescott	73U25945LT0026224	\$1,000.00
1/23/18	Payment from Carl Wescott	4RC05531TN3851603	\$18.00
1/20/18	Payment from Carl Wescott	64V7001578379450R	\$100.00
1/16/18	Payment from Carl Wescott	1TV0509035793103D	\$0.01
1/16/18	Payment from Carl Wescott	5X305566SX653062X	\$501.99
12/28/17	Payment from Carl Wescott	37U57053NP744245U	\$18.00
12/23/17	Payment from Carl Wescott	6BE40205D8809250R	\$75.00
12/19/17	Payment from Carl Wescott	47603519LF791241D	\$62.50
12/15/17	Payment from Carl Wescott	8KN52966P3349131L	\$237.51
12/12/17	Payment from Carl Wescott	9EY756159P743751V	\$145.00
12/4/17	Payment from Carl Wescott	2YA25171LL951231V	\$185.00
12/1/17	Payment from Carl Wescott	8YS427894A886690N	\$165.00
11/24/17	Payment from Carl Wescott	75C41293NE808534J	\$121.26
11/22/17	Payment from Carl Wescott	4XT56516VB828220V	\$212.50
10/29/17	Payment from Carl Wescott	6NP89478BA7353823	\$25.00
10/28/17	Payment from Carl Wescott	4WY93548VG469700G	\$100.00
10/27/17	Payment from Carl Wescott	0PC88335VV8792116	\$103.00
10/24/17	Payment from Carl Wescott	6MU41255LE999754W	\$162.50
10/19/17	Payment from Carl Wescott	43281822WB9222316	\$150.00
10/8/17	Payment from Carl Wescott	4UB35968A91247420	\$0.00
10/7/17	Payment from Carl Wescott	55E78276J08867508	\$40.00
10/6/17	Payment from Carl Wescott	0XC34600LW129441E	\$10.00
			\$43,850.88 TOTAL

EXHIBIT 11

From: "Robert J. Block" <rjbrib1@gmail.com>
Date: September 12, 2019 at 11:39:01 AM MDT
To: David Zeff <dmz@zefflaw.com>
Subject: Wescott

He hacked into my email, violating the stored communications act among other things. He bluffed and bullied. I consulted a lawyer here who has persuaded me he is ultimately not a threat. Apologies for the radio silence but I needed to protect my flank - his attack was most unexpected. He is an IT expert, that's the only thing about him that's genuine so security is important.

I imagine that you would imagine we are working some scam but I can forward his threats and imprecations.

I am prepared to sign a revised Dec if that would help.

If not, I understand and good luck. I wouldn't pay him a penny.

EXHIBIT 12

CRAIG C. DANIEL (212588)
JUSTIN L. SOWA (305002)
GLUCK DANIEL LLP
One Sansome Street, Suite 720
San Francisco, CA 94104
Telephone 415-510-2114
Facsimile 415-510-2208
Email litigation@gluckdaniel.com

Attorneys for Defendant
BERNARD MOON

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO, CENTRAL DIVISION

FREDERICK C. FIECHTER, ET AL.,

Plaintiff,

v.

CARL WESCOTT, ET AL.,

Defendants.

Case No. CPF-11-511547

**THIRD-PARTY BERNARD MOON'S
OBJECTIONS AND RESPONSES TO
DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS
ISSUED BY FREDERICK FIECHTER**

Pursuant to California Code of Civil Procedure sections 2020.010 et seq., Third-Party Bernard Moon hereby responds to Plaintiff Frederick C. Fiechter's May 21, 2019 Deposition Subpoena for Production of Business Records.

This response to the Requests is made to the best of Responding Party's present knowledge, information, and belief. This response is at all times subject to such additional or different information that discovery or further investigation may disclose and, while based on the present state of Responding Party's recollection, is subject to such refreshing of recollection, and such additional knowledge off acts as may result from Responding Party's further discovery or investigation. Responding Party reserves the right but assumes no responsibility to conduct further investigation or discovery.

1 Responding Party will not produce documents or materials that he deems to embody
 2 material that is private, business confidential, proprietary, trade secret, or otherwise protected from
 3 disclosure pursuant to California Constitution, article I, section 1, or California Evidence Code
 4 section 1060. Under appropriate circumstances, Responding Party may agree to produce such
 5 documents upon the entry of, and subject to, an appropriate protective order against the
 6 unauthorized use or disclosure of such information.

7 Responding Party reserves all objections or other questions as to the competency,
 8 relevance, materiality, privilege or admissibility as evidence in any subsequent proceeding in or
 9 trial of this or any other action for any purpose whatsoever of this response and any document or
 10 thing produced in response to the Requests.

11 Any representation that Responding Party will produce documents responsive to a
 12 particular request is not a representation that such documents actually exist.

13 **GENERAL OBJECTIONS**

14 Responding Party objects to the definitions of “refer,” “refers to,” and “referring to” as
 15 being overbroad, vague, encompassing documents unrelated to the action, and placing an undue
 16 burden on the Responding Party. Responding Party will interpret documents that “refer to” a
 17 given topic to mean documents that reflect or refer to that topic on their face.

18 Responding Party objects to any demand that seeks documents or information that is
 19 publicly available or available through the parties to the litigation.

20 **SPECIFIC REQUESTS**

21 **Request no. 1**

22 True copies of each and every DOCUMENT in YOUR possession custody or control,
 23 which shows or REFERS to any past or present property interest CARL WESCOTT, aka KALLE
 24 WESCOTT, has or claims to have with you or in any of your business entities, including, but not
 25 limited to cash, sums on deposit, credits, checking and savings accounts, PayPal accounts, crypto
 26 currency accounts (including, but not limited to Bitcoin, Aziza Coin, Aziza Project, Ethereum and
 27 the like), brokerage accounts, credit union accounts, chattel paper, accounts receivable,
 28 commission or royalty rights, promissory notes to CARL WESCOTT, aka KALLE WESCOTT,

1 general intangibles, property subject to pending actions, final money judgments, securities of all
2 kinds, stocks, bonds, debentures, options, options contracts, any interest in any LLC, LLP,
3 partnership, limited partnership, computers and/or equipment of any kind.

4 **Response to Request no. 1**

5 Subject to and without waiving the foregoing general objections, Responding Party will
6 produced non-privileged documents in his custody or control responsive to this Request.

7 **Request no. 2**

8 True copies of each and every DOCUMENT in YOUR possession, custody or control,
9 which shows or REFERS to any cash, credits, wires, ACH transfers or any other thing of value
10 YOU have received from CARL WESCOTT, aka KALLE WESCOTT, or any person or entity
11 acting on his behalf, including, but not limited to PayPal, Inc., cryptocurrency accounts (including,
12 but not limited to Bitcoin, Aziza Coin, Aziza Project, Ethereum and the like), Side Coast, Inc.,
13 Percy Haulund, Bernard Moon, Robert Block, Monette R. Stephens, and/or Zoom Systems
14 Corporation, during the period starting on September 6, 2010 (one year before this Judgment was
15 entered) and the date of YOUR response hereto.

16 **Response to Request no. 2**

17 Subject to and without waiving the foregoing general objections, Responding Party will
18 produced non-privileged documents in his custody or control responsive to this Request.

19 **Request no. 3**

20 True copies of each and every DOCUMENT in YOUR possession, custody or control,
21 which shows or REFERS to any cash, credits, wires, ACH transfers or any other thing of value
22 YOU have given, delivered or sent, or caused to be given, delivered or sent, to CARL WESCOTT,
23 aka KALLE WESCOTT, or to any person or entity on his behalf, including, but not limited to
24 PayPal, Inc., crypto currency accounts (including, but not limited to Bitcoin, Aziza Coin, Aziza
25 Project, Ethereum and the like), Side Coast, Inc., Percy Haulund, Bernard Moon, Robert Block,
26 Monette R. Stephens, and/or Zoom Systems Corporation, during the period starting on September
27 6, 2010 (one year before this Judgment was entered) and the date of YOUR response hereto.

28

Response to Request no. 3

Subject to and without waiving the foregoing general objections, Responding Party will produce non-privileged documents in his custody or control responsive to this Request.

GLUCK DANIEL LLP

Dated: July 29, 2019



Craig C. Daniel
Attorneys for BERNARD MOON

Hello, Bernard Moon



You sent \$500.00 USD to Carl
Wescott

Transaction Details

Transaction ID: 9SR81525B0910062A

May 10, 2019

Money sent

\$500.00 USD



Fee

PAID WITH

PayPal Credit

\$514.80 USD

You paid

\$514.80 USD

Carl Wescott will receive

\$500.00 USD

Please note it may take a little while for this payment to appear in the Activity section of your account.

[Get the Details](#)



[Help & Contact](#) | [Security](#) | [Apps](#)



Right to Refund

You, the customer, are entitled to a refund of the money to be transmitted as the result of this agreement if PayPal, Inc. does not forward the money received from you within 10 days of the date of its receipt, or does not give instructions committing an equivalent amount of money to the person designated by you within 10 days of the date of the receipt of the funds from you unless otherwise instructed by you.

If your instructions as to when the moneys shall be forwarded or transmitted are not complied with and the money has not yet been forwarded or transmitted, you have a right to a refund of your



If you want a refund, you must mail or deliver your written request to PayPal, Inc., at P.O. Box 45950, Omaha, NE 68145-0950. If you do not receive your refund, you may be entitled to your money back plus a penalty of up to \$1,000 and attorney's fees pursuant to section 2102 of the California Financial Code.

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PayPal PPC000956:1.9:e9e6e96815125



Hello, Bernard Moon



You sent \$1,541.66 USD to Carl Wescott

Transaction Details

Transaction ID: 48H45347GX354740X

April 14, 2019

Money sent

\$1,541.66 USD

Fee

PAID WITH

AMEX 1008

\$1,586.67 USD

You paid

\$1,586.67 USD

Carl Wescott will receive

\$1,541.66 USD

Please note it may take a little while for this payment to appear in the Activity section of your account.

[Get the Details](#)



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PayPal PPC000956:1.3:3a4202ee16a53

Hello, Bernard Moon



You sent \$1,100.00 USD to Carl
Wescott

Transaction Details

Transaction ID: 6TA88525767013013

March 18, 2019

Money sent

\$1,100.00 USD

Fee

\$32.20 USD

PAID WITH

AMEX 1008

\$1,132.20 USD

You paid

\$1,132.20 USD

Carl Wescott will receive

\$1,100.00 USD

Please note it may take a little while for this payment to appear in the Activity section of your account.

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and the money has not yet been forwarded or transmitted, you have a right to a refund of your money.

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PayPal PPC000956:1.3:c638ba0ce2455

Hello, Bernard Moon



You sent \$855.00 USD to Carl
Wescott

Transaction Details

Transaction ID: 3V6688600W2648326

February 20, 2019

Money sent

\$855.00 USD

Fee

PAID WITH
AMEX 1008

\$880.10 USD

You paid	\$880.10 USD
Carl Wescott will receive	\$855.00 USD

Please note it may take a little while for this payment to appear in the Activity section of your account.

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Right to Refund

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PayPal PPC000956:1.52.44.0.0.2:f9e0589f3332b

Hello, Bernard Moon



You sent \$1,000.00 USD to robert
block

Transaction Details

Transaction ID: 28J29829WR605580T

May 29, 2019

Money sent

\$1,000.00 USD

Fee

PAID WITH

PayPal Credit

\$1,029.30 USD

You paid

\$1,029.30 USD

robert block will receive

\$1,000.00 USD

Please note it may take a little while for this payment to appear in the Activity section of your account.

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PayPal PPC000956:1.9:a74d44c982033

PROOF OF SERVICE

I, **Brenda Martinez-Eby**, declare as follows: I am a citizen of the United States, over the age of eighteen years and not a party to the within entitled action. My business address is Gluck Daniel LLP, One Sansome Street, Suite 720, San Francisco, California 94104. I served the attached paper identified below on the interested parties in said action, by placing a true copy thereof in sealed envelope(s) addressed as indicated and served the named document in the manner indicated below

**THIRD-PARTY BERNARD MOON'S OBJECTIONS AND RESPONSES TO
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS ISSUED BY
FREDERICK FIECHTER**

Service upon:

David M. Zeff, Esq.
1100 Larkspur Circle, Suite 350
Larkspur, CA 94939
Tel.: (415) 923-1380
Fax: (415) 923-1382
Email: dmz@zefflaw.com

*Attorney for Plaintiff and Judgment Creditor
FREDERICK C. FIECHTER*

- ☒ **BY MAIL:** I caused true and correct copies of the above document(s) to be served by mail on the above date by personally placing and sealing said document(s) in an envelope or package suitable for mailing, addressed to the addressee(s) and including this firm's return address, and then, following ordinary office practice, placing said sealed envelope in the office's usual location for collection and mailing with the United States Postal Service.
- ☐ **BY NEXT-DAY OVERNIGHT SERVICE:** I caused true and correct copies of the above document(s) to be placed within a sealed envelope or other package suitable for overnight shipment, addressed to the addressee(s) and including this firm's return address, and delivered on the date stated above to an overnight delivery service for delivery to the addressee(s) on the following business day.
- ☐ **BY HAND DELIVERY:** I caused true and correct copies of the above document(s) to be placed within a sealed envelope or other package suitable for handling by a messenger or courier service and then caused the package to be hand-delivered by a same-day messenger service to the addressee(s) on this date.
- ☒ **BY EMAIL:** I caused true and correct copies of the above document(s) to be sent via email to the addressee(s) on this date. I did not receive a notice indicating delivery failure.
- ☐ **BY E-SERVICE:** I caused true and correct copies of the above document(s) to be sent via electronic transmission through the Court's E-service vendor in conformity with San Francisco Superior Court Local Rule 2.10 in transaction number XXX.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed **July 29, 2019**, at San Francisco, California.

Brenda Martinez-Eby
Brenda Martinez-Eby

EXHIBIT 13

Wescott PayPal Activity re Travel10/2017 - 4/2019

Platform	Date / Time	Total	Name	Email
PAYPAL	10-06-2017 21:41:58	\$30.63	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	10-06-2017 21:41:20	\$30.63	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	10-09-2017 20:32:54	\$129.99	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	10-09-2017 20:32:14	\$129.99	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	10-09-2017 20:24:25	\$31.18	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	10-09-2017 20:23:42	\$31.18	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	10-19-2017 12:16:19	\$737.69	United Airlines, Inc	paypal@coair.com
PAYPAL	10-21-2017 03:06:13	\$737.69	United Airlines, Inc	paypal@coair.com
PAYPAL	12-12-2017 15:50:20	\$31.91	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	12-12-2017 15:49:47	\$31.91	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	02-09-2019 02:11:02	\$48.55	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	02-09-2019 02:11:02	\$48.55	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	02-09-2019 02:11:37	\$48.55	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	02-26-2019 06:01:51	\$81.12	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	02-26-2019 06:02:23	\$81.12	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	02-26-2019 06:01:51	\$81.12	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	03-13-2019 07:43:47	\$101.53	HOTELS.COM SGP	hsg_pp@expedia.com
PAYPAL	03-13-2019 07:43:12	\$101.53	HOTELS.COM SGP	hsg_pp@expedia.com
PAYPAL	03-13-2019 07:43:12	\$101.53	HOTELS.COM SGP	hsg_pp@expedia.com
PAYPAL	03-20-2019 23:19:54	\$106.90	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	03-20-2019 23:19:18	\$106.90	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	03-20-2019 23:19:18	\$106.90	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	04-16-2019 12:41:50	\$260.52	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	04-16-2019 12:41:50	\$260.52	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	04-16-2019 12:42:25	\$260.52	HOTELS.COM USA	hus_pp@expedia.com
PAYPAL	04-21-2019 06:06:39	\$11.20	United Airlines, Inc	paypal@united.com
PAYPAL	04-23-2019 04:07:32	\$11.20	United Airlines, Inc	paypal@united.com
PAYPAL	04-21-2019 06:06:39	\$11.20	United Airlines, Inc	paypal@united.com
		\$3,752.26		

EXHIBIT 14

Platform	Account Number	Agent Info	IP	First Used Date	Last Used Date	Log	Is Signup IP	Is Bad IP	Is Ofac IP	Is Spoof IP	Is High Risk IP	Country	Region	City	Start IP	End IP	Geo Country	Geo State
PAYPAL	1268990030431179647		201.144.25.1	06-23-2009	06-23-2009 2		FALSE	FALSE	FALSE	FALSE	FALSE	MX		mexico city	201.144.25.0	201.144.25.81	mx	ciudad de mexico
PAYPAL	1268990030431179647		71.141.121.49	05-03-2009	05-03-2009 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	san francisco	71.141.121.0	71.141.121.255	us	california
PAYPAL	1268990030431179647		99.154.117.63	04-22-2009	04-22-2009 2		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	99.154.117.0	99.154.117.255	us	washington
PAYPAL	1268990030431179647		71.141.103.249	02-10-2009	02-10-2009 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	san francisco	71.141.103.0	71.141.103.255	us	california
PAYPAL	1268990030431179647		71.141.108.199	12-13-2008	12-13-2008 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	san francisco	71.141.108.0	71.141.108.255	us	california
PAYPAL	1268990030431179647		99.154.119.168	12-07-2008	12-07-2008 2		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	99.154.119.0	99.154.119.255	us	washington
PAYPAL	1268990030431179647		201.234.16.102	11-19-2008	11-19-2008 1		FALSE	FALSE	FALSE	FALSE	FALSE	AR		buenos aires	201.234.16.0	201.234.16.127	ar	capital federal
PAYPAL	1268990030431179647		71.141.127.93	11-08-2008	11-11-2008 2		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	san francisco	71.141.127.0	71.141.127.255	us	california
PAYPAL	1268990030431179647		64.75.218.2	10-31-2008	11-01-2008 3		FALSE	FALSE	FALSE	FALSE	FALSE	US	HI	honolulu	64.75.218.0	64.75.218.134	us	hawaii
PAYPAL	1268990030431179647		76.200.172.188	10-21-2008	10-21-2008 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	76.200.172.0	76.200.172.255	us	washington
PAYPAL	1268990030431179647		190.40.173.19	10-16-2008	10-16-2008 1		FALSE	FALSE	FALSE	FALSE	FALSE	PE		lima	190.40.173.0	190.40.173.255	pe	
PAYPAL	1268990030431179647		98.173.203.162	10-11-2008	10-11-2008 3		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	surfside	98.173.203.160	98.173.203.163	us	california
PAYPAL	1268990030431179647		194.251.170.108	07-22-2008	07-22-2008 1		FALSE	FALSE	FALSE	FALSE	FALSE	FI		tampere	194.251.170.96	194.251.170.127	fi	
PAYPAL	1268990030431179647		24.23.193.87	07-25-2006	05-26-2007 7		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	santa clara	24.23.193.0	24.23.193.255	us	california
PAYPAL	1268990030431179647		202.21.178.27	05-08-2007	05-08-2007 2		FALSE	FALSE	FALSE	FALSE	FALSE	MV		male	202.21.178.10	202.21.178.40	mv	
PAYPAL	1268990030431179647		71.141.102.70	02-18-2007	02-18-2007 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	san francisco	71.141.102.0	71.141.102.255	us	california
PAYPAL	1268990030431179647		71.141.115.27	09-12-2006	09-12-2006 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	san francisco	71.141.115.0	71.141.115.255	us	california
PAYPAL	1268990030431179647		71.141.110.120	08-21-2006	08-22-2006 2		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	san francisco	71.141.110.0	71.141.110.255	us	california
PAYPAL	1268990030431179647		67.188.35.156	02-27-2006	07-13-2006 19		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	hayward	67.188.35.64	67.188.35.255	us	california
PAYPAL	1268990030431179647		63.80.146.210	07-12-2006	07-12-2006 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	santa clara	63.80.146.208	63.80.146.223	us	california
PAYPAL	1268990030431179647		80.187.152.145	06-22-2006	06-22-2006 1		FALSE	FALSE	FALSE	FALSE	FALSE	DE		bonn	80.187.152.0	80.187.152.255	de	nordrhein-westfalen
PAYPAL	1268990030431179647		212.19.41.226	06-20-2006	06-20-2006 1		FALSE	FALSE	FALSE	FALSE	FALSE	DE		stuttgart	212.19.41.225	212.19.41.255	de	baden-wuerttemberg
PAYPAL	1268990030431179647		71.141.135.75	03-27-2006	03-27-2006 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	seattle	71.141.135.0	71.141.135.255	us	washington
PAYPAL	1268990030431179647		64.46.81.50	03-09-2006	03-09-2006 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	FL	key biscayne	64.46.81.50	64.46.81.50	us	florida
PAYPAL	1268990030431179647		12.164.248.236	02-18-2006	02-18-2006 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	middletown	12.164.248.225	12.164.248.246	us	new jersey
PAYPAL	1268990030431179647		67.122.207.206	09-16-2005	09-16-2005 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	67.122.207.0	67.122.207.255	us	washington
PAYPAL	1268990030431179647		67.122.205.180	09-01-2005	09-01-2005 2		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	67.122.205.0	67.122.205.255	us	washington
PAYPAL	1268990030431179647		67.122.206.77	08-25-2005	08-25-2005 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	67.122.206.0	67.122.206.255	us	washington
PAYPAL	1268990030431179647		67.122.204.160	08-11-2005	08-11-2005 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	67.122.204.0	67.122.204.255	us	washington
PAYPAL	1268990030431179647		67.125.86.21	08-05-2005	08-05-2005 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	67.125.86.0	67.125.86.255	us	washington
PAYPAL	1268990030431179647		67.122.206.152	08-04-2005	08-04-2005 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	67.122.206.0	67.122.206.255	us	washington
PAYPAL	1268990030431179647		63.206.121.164	08-02-2005	08-02-2005 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	san francisco	63.206.121.0	63.206.121.255	us	california
PAYPAL	1268990030431179647		67.125.86.250	07-29-2005	07-29-2005 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	67.125.86.0	67.125.86.255	us	washington
PAYPAL	1268990030431179647		67.122.204.104	07-18-2005	07-19-2005 2		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	67.122.204.0	67.122.204.255	us	washington
PAYPAL	1268990030431179647		208.54.15.129	07-10-2005	07-10-2005 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	bellevue	208.54.15.0	208.54.15.255	us	washington
PAYPAL	1268990030431179647		67.122.204.18	06-01-2005	06-16-2005 4		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	67.122.204.0	67.122.204.255	us	washington
PAYPAL	1268990030431179647		67.122.204.185	05-07-2005	05-07-2005 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	67.122.204.0	67.122.204.255	us	washington
PAYPAL	1268990030431179647		63.206.123.34	05-05-2005	05-05-2005 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	san francisco	63.206.123.0	63.206.123.255	us	california
PAYPAL	1268990030431179647		67.125.84.47	04-21-2005	05-03-2005 6		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	67.125.84.0	67.125.84.255	us	washington
PAYPAL	1268990030431179647		63.206.120.64	04-13-2005	04-15-2005 2		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	san francisco	63.206.120.0	63.206.120.255	us	california
PAYPAL	1268990030431179647		67.122.206.89	03-31-2005	04-04-2005 3		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	67.122.206.0	67.122.206.255	us	washington
PAYPAL	1268990030431179647		67.122.206.159	01-06-2005	03-10-2005 3		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	67.122.206.0	67.122.206.255	us	washington
PAYPAL	1268990030431179647		63.196.7.160	12-20-2004	12-20-2004 2		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	63.196.7.0	63.196.7.255	us	washington
PAYPAL	1268990030431179647		69.106.226.210	08-27-2004	08-27-2004 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	san francisco	69.106.226.0	69.106.226.255	us	california
PAYPAL	1268990030431179647		69.107.3.76	08-04-2004	08-04-2004 3		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	seattle	69.107.3.0	69.107.3.255	us	washington
PAYPAL	1268990030431179647		12.44.172.114	04-29-2003	04-29-2003 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	middletown	12.44.172.96	12.44.172.255	us	new jersey
PAYPAL	1268990030431179647		64.162.71.123	01-27-2002	06-18-2002 9		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	san francisco	64.162.71.123	64.162.71.127	us	california

Geo City	Zip Code	Latitude	Longitude	Proxy Status	Date Updated	Geo Region	Area Code	City Conf	Connection Speed	Country Conf	Domain Name	ISP Name	Metro Code	Region Conf	Zip Country
mexico city	14620	19.42	-99.14	?	2019-02-03	cmx	0.0	5.0	broadband	5.0	uninet-ide.com.mx	uninet s.a. de c.v.	-1.0	5.0	mex
san francisco	94107	37.79	-122.44	?	2019-04-03	ca	415.0	5.0	xdsl	5.0	pacbell.net	att internet services	807.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
san francisco	94107	37.79	-122.44	?	2019-04-03	ca	415.0	5.0	xdsl	5.0	pacbell.net	att internet services	807.0	5.0	usa
san francisco	94107	37.79	-122.44	?	2019-04-03	ca	415.0	5.0	xdsl	5.0	pacbell.net	att internet services	807.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
buenos aires	c1001	-34.61	-58.42	?	2018-09-03	c	0.0	5.0	broadband	5.0	?	impsat fiber networks inc	-1.0	5.0	arg
san francisco	94107	37.79	-122.44	?	2019-04-03	ca	415.0	5.0	xdsl	5.0	pacbell.net	att internet services	807.0	5.0	usa
honorolulu	96813	21.28	-157.76	?	2019-02-03	hi	808.0	5.0	broadband	5.0	progressive-hi.com	hawaii online	744.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
lima	15000	-12.04	-77.02	?	2018-06-13	lma	0.0	5.0	mobile	5.0	telefonica.com.pe	telefonica del peru s.a.a.	-1.0	5.0	per
surfside	90743	33.73	-118.08	?	2019-04-03	ca	562.0	4.0	cable	5.0	cox.net	cox communications inc.	803.0	4.0	usa
tampere	33900	61.5	23.76	?	2019-04-03	11	0.0	4.0	broadband	5.0	sonera.fi	teliasonera finland oyj	246013.0	5.0	fin
santa clara	95051	37.35	-121.95	?	2019-04-03	ca	408.0	4.0	cable	5.0	comcast.net	comcast cable communications inc.	807.0	4.0	usa
male	0	4.18	73.51	?	2019-01-03	mle	0.0	5.0	broadband	5.0	gov.mv	focus infocom private limited	-1.0	5.0	mdv
san francisco	94107	37.79	-122.44	?	2019-04-03	ca	415.0	5.0	xdsl	5.0	pacbell.net	att internet services	807.0	5.0	usa
san francisco	94107	37.79	-122.44	?	2019-04-03	ca	415.0	5.0	xdsl	5.0	pacbell.net	att internet services	807.0	5.0	usa
san francisco	94107	37.79	-122.44	?	2019-04-03	ca	415.0	5.0	xdsl	5.0	pacbell.net	att internet services	807.0	5.0	usa
hayward	94544	37.67	-122.08	?	2019-04-03	ca	510.0	4.0	cable	5.0	comcast.net	comcast cable communications inc.	807.0	4.0	usa
santa clara	95050	37.35	-121.95	?	2019-04-03	ca	408.0	5.0	broadband	5.0	verizon.com	verizon business	807.0	5.0	usa
bonn	53111	50.72	7.05	?	2019-04-03	nw	0.0	5.0	mobile	5.0	t-mobile.de	t-mobile deutschland gmbh	276002.0	5.0	deu
stuttgart	70173	48.78	9.18	?	2019-04-03	bw	0.0	4.0	broadband	5.0	?	plus.line ag	276004.0	4.0	deu
seattle	98108	47.61	-122.34	corporate	2019-04-03	wa	206.0	5.0	broadband	5.0	amazon.com	amazon.com inc.	819.0	5.0	usa
key biscayne	33149	25.69	-80.17	corporate	2019-04-03	fl	305.0	5.0	broadband	5.0	sheron-quito.com	access internet	528.0	5.0	usa
middletown	07748	40.4	-74.11	?	2019-04-03	nj	732.0	4.0	broadband	5.0	sbcox.net	att services inc.	501.0	4.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
san francisco	94107	37.79	-122.44	?	2019-04-03	ca	415.0	5.0	xdsl	5.0	att.net	att internet services	807.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
bellevue	98006	47.61	-122.17	?	2019-04-03	wa	425.0	5.0	mobile	5.0	t-mobile.com	t-mobile usa inc.	819.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
san francisco	94107	37.79	-122.44	?	2019-04-03	ca	415.0	5.0	xdsl	5.0	att.net	att internet services	807.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
san francisco	94107	37.79	-122.44	?	2019-04-03	ca	415.0	5.0	xdsl	5.0	att.net	att internet services	807.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
redmond	98052	47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
san francisco	94104	37.79	-122.44	?	2019-04-03	ca	415.0	5.0	xdsl	5.0	pacbell.net	att internet services	807.0	5.0	usa
seattle	98108	47.61	-122.34	corporate	2019-04-03	wa	206.0	5.0	broadband	5.0	amazon.com	amazon.com inc.	819.0	5.0	usa
middletown	07748	40.4	-74.11	?	2019-04-03	nj	732.0	4.0	broadband	5.0	att.com	att services inc.	501.0	4.0	usa
san francisco	94104	37.79	-122.44	?	2019-04-03	ca	415.0	5.0	xdsl	5.0	pacbell.net	att internet services	807.0	5.0	usa

Platform	Account Number	Agent Info	IP	First Used Date	Last Used Date	Login Count	Is Signup IP	Is Bad IP	Is Ofac IP	Is Spoof IP	Is High Risk IP	Country	Region	City	Start IP	End IP	Geo Country
PAYPAL	1508018676141761352		174.222.133.109	04-26-2019	04-26-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.222.133.0	174.222.133.1	us
PAYPAL	1508018676141761352		174.214.24.204	04-22-2019	04-22-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.214.24.0	174.214.24.2	us
PAYPAL	1508018676141761352		174.215.43.200	04-17-2019	04-17-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.43.0	174.215.43.2	us
PAYPAL	1508018676141761352		174.215.21.62	04-16-2019	04-16-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.21.0	174.215.21.2	us
PAYPAL	1508018676141761352		174.214.33.100	04-15-2019	04-15-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.214.33.0	174.214.33.2	us
PAYPAL	1508018676141761352		174.215.0.84	04-12-2019	04-12-2019 3		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.0.0	174.215.0.25	us
PAYPAL	1508018676141761352		174.215.21.49	04-11-2019	04-11-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.21.0	174.215.21.2	us
PAYPAL	1508018676141761352		134.0.204.210	03-18-2019	03-21-2019 6		FALSE	FALSE	FALSE	FALSE	FALSE	OM		masqat	134.0.204.0	134.0.204.25	om
PAYPAL	1508018676141761352		173.209.212.158	03-18-2019	03-18-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	FL	tampa	173.209.212.0	173.209.212.1	us
PAYPAL	1508018676141761352		174.215.44.44	03-15-2019	03-15-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.44.0	174.215.44.2	us
PAYPAL	1508018676141761352		103.14.185.12	03-13-2019	03-13-2019 3		FALSE	FALSE	FALSE	FALSE	FALSE	SG		singapore	103.14.185.0	103.14.185.2	sg
PAYPAL	1508018676141761352		42.61.191.94	03-02-2019	03-02-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	SG		singapore	42.61.191.0	42.61.191.25	sg
PAYPAL	1508018676141761352		219.74.18.66	02-28-2019	02-28-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	SG		singapore	219.74.18.0	219.74.18.25	sg
PAYPAL	1508018676141761352		118.201.227.81	02-28-2019	02-28-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	SG		singapore	118.201.227.0	118.201.227.1	sg
PAYPAL	1508018676141761352		174.215.22.35	02-26-2019	02-26-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.22.0	174.215.22.2	us
PAYPAL	1508018676141761352		174.215.48.247	02-22-2019	02-22-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.48.0	174.215.48.2	us
PAYPAL	1508018676141761352		174.214.0.7	02-22-2019	02-22-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.214.0.0	174.214.0.25	us
PAYPAL	1508018676141761352		174.215.63.31	02-20-2019	02-20-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.63.0	174.215.63.2	us
PAYPAL	1508018676141761352		67.221.169.243	09-16-2017	02-19-2019 123		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	san francisco	67.221.169.195	67.221.169.2	us
PAYPAL	1508018676141761352		174.215.0.252	02-14-2019	02-14-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.0.0	174.215.0.25	us
PAYPAL	1508018676141761352		174.224.12.51	02-10-2019	02-10-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.224.12.0	174.224.12.2	us
PAYPAL	1508018676141761352		67.139.178.66	02-10-2019	02-10-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	OR	portland	67.139.178.0	67.139.178.2	us
PAYPAL	1508018676141761352		174.215.38.41	02-09-2019	02-09-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.38.0	174.215.38.2	us
PAYPAL	1508018676141761352		174.215.40.129	02-09-2019	02-09-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.40.0	174.215.40.2	us
PAYPAL	1508018676141761352		174.214.1.42	02-04-2019	02-04-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.214.1.0	174.214.1.25	us
PAYPAL	1508018676141761352		174.214.7.91	02-04-2019	02-04-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.214.7.0	174.214.7.25	us
PAYPAL	1508018676141761352		174.215.43.16	02-02-2019	02-02-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.43.0	174.215.43.2	us
PAYPAL	1508018676141761352		174.214.9.151	02-01-2019	02-01-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.214.9.0	174.214.9.25	us
PAYPAL	1508018676141761352		174.214.18.40	01-26-2019	01-26-2019 2		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.214.18.0	174.214.18.2	us
PAYPAL	1508018676141761352		174.215.43.75	01-23-2019	01-23-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.43.0	174.215.43.2	us
PAYPAL	1508018676141761352		174.215.21.191	01-19-2019	01-19-2019 2		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.21.0	174.215.21.2	us
PAYPAL	1508018676141761352		174.215.52.113	01-08-2019	01-08-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.52.0	174.215.52.2	us
PAYPAL	1508018676141761352		75.25.141.49	01-07-2019	01-08-2019 4		FALSE	FALSE	FALSE	FALSE	FALSE	US	WA	redmond	75.25.141.0	75.25.141.25	us
PAYPAL	1508018676141761352		174.214.19.236	01-07-2019	01-07-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.214.19.0	174.214.19.2	us
PAYPAL	1508018676141761352		174.215.20.178	01-06-2019	01-06-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.20.0	174.215.20.2	us
PAYPAL	1508018676141761352		174.215.20.42	01-04-2019	01-04-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.20.0	174.215.20.2	us
PAYPAL	1508018676141761352		174.215.48.78	01-03-2019	01-03-2019 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.48.0	174.215.48.2	us
PAYPAL	1508018676141761352		102.165.74.17	12-30-2018	12-30-2018 2		FALSE	FALSE	FALSE	FALSE	FALSE	ZA		fish hoek	102.165.74.0	102.165.74.2	za
PAYPAL	1508018676141761352		174.214.19.210	12-23-2018	12-23-2018 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.214.19.0	174.214.19.2	us
PAYPAL	1508018676141761352		174.215.45.239	12-19-2018	12-19-2018 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.45.0	174.215.45.2	us
PAYPAL	1508018676141761352		73.189.147.209	04-30-2018	12-17-2018 4		FALSE	FALSE	FALSE	FALSE	FALSE	US	CA	windsor	73.189.147.0	73.189.147.2	us
PAYPAL	1508018676141761352		174.214.4.138	12-06-2018	12-06-2018 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.214.4.0	174.214.4.25	us
PAYPAL	1508018676141761352		174.214.2.48	11-27-2018	11-27-2018 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.214.2.0	174.214.2.25	us
PAYPAL	1508018676141761352		72.223.23.6	01-09-2018	11-20-2018 28		FALSE	FALSE	FALSE	FALSE	FALSE	US	AZ	phoenix	72.223.23.0	72.223.23.25	us
PAYPAL	1508018676141761352		174.215.38.76	11-19-2018	11-19-2018 1		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.38.0	174.215.38.2	us
PAYPAL	1508018676141761352		174.215.20.27	11-17-2018	11-17-2018 2		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.20.0	174.215.20.2	us
PAYPAL	1508018676141761352		174.214.9.39	11-16-2018	11-16-2018 3		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.214.9.0	174.214.9.25	us
PAYPAL	1508018676141761352		174.214.18.53	11-14-2018	11-14-2018 3		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.214.18.0	174.214.18.2	us
PAYPAL	1508018676141761352		97.41.129.128	11-11-2018	11-11-2018 2		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	97.41.129.0	97.41.129.25	us
PAYPAL	1508018676141761352		174.215.42.132	11-11-2018	11-11-2018 2		FALSE	FALSE	FALSE	FALSE	FALSE	US	NJ	livingston	174.215.42.0	174.215.42.2	us

Geo State	Geo City	Zip Code		Latitude	Longitude	Proxy Status	Date Updated	Geo ID	Area Code	City Conf	Connection Speed	Country	Domain Name	ISP Name	Metro Cd	Region	Zip Co
			84 Irving Ave., Livingston NJ 07039	40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
			near unnamed road, Ruwi, Muscat, Oman	23.6	58.54	?	2018-06-13	ma	0.0	5.0	mobile	5.0	?	omantel	-1.0	5.0	omn
florida	masqat	112		28.06	-82.46	?	2019-04-03	fl	813.0	5.0	broadband	5.0	syniverse.com	hosted data solutions llc	539.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
			near 68 Prinsep St., Singapore 188661	1.3	103.85	?	2018-06-13	01	0.0	5.0	broadband	5.0	?	60 airport boulevard	-1.0	5.0	sgp
	singapore	148943		1.3	103.85	?	2019-02-03	01	0.0	4.0	broadband	5.0	singnet.com.sg	singnet pte ltd	-1.0	5.0	sgp
	singapore	148943		1.3	103.85	?	2019-02-03	01	0.0	4.0	broadband	5.0	singnet.com.sg	singnet pte ltd	-1.0	5.0	sgp
	singapore	148943		1.3	103.85	?	2019-02-03	01	0.0	4.0	broadband	5.0	singnet.com.sg	singnet pte ltd	-1.0	5.0	sgp
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
			2816 Clay Street, San Francisco, CA 94115	37.79	-122.44	?	2019-04-03	ca	415.0	5.0	broadband	5.0	mentacapital.com	unitedlayer inc.	807.0	5.0	usa
california	san francisco	94103		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
oregon	portland	97205		45.5	-122.69	?	2019-04-03	or	503.0	5.0	xdsl	5.0	integratelecom.com	integra telecom inc.	820.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
washington	redmond	98052		47.63	-122.05	?	2019-04-03	wa	425.0	4.0	xdsl	5.0	att.net	att internet services	819.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
			near Clovelly Rd., Fish Hoek, South Africa	-34.12	18.43	?	2018-06-13	wc	0.0	5.0	broadband	5.0	?	african network information c	-1.0	5.0	zaf
western cape	fish hoek	s-7975		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
			near 8109 Conde Ln., Windsor CA 95492	38.54	-122.81	?	2019-04-03	ca	707.0	4.0	cable	5.0	comcast.net	comcast cable communication	807.0	4.0	usa
california	windsor	95492		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	verizonwireless.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
			Phoenix Convention Center, 100 N, 3rd Street, Pheonix AZ 85004	33.45	-112.07	?	2018-01-01	az	602.0	4.0	cable	5.0	cox.net	cox communications inc.	753.0	4.0	usa
arizona	phoenix	85032		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa
new jersey	livingston	07039		40.79	-74.32	?	2019-04-03	nj	973.0	4.0	mobile	5.0	myvzw.com	verizon wireless	501.0	5.0	usa

EXHIBIT 15

COOLEY LLP
LESLIE V. CANCEL (160652)
(LCANCEL@COOLEY.COM)
JOSHUA E. ELEFANT (312913)
(JELEFANT@COOLEY.COM)
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
Facsimile: (650) 849-7400

Attorneys for Third Party
SPARKLABS MANAGEMENT, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO

CARL A. WESCOTT,

Petitioner,

v.

MONETTE R. STEPHENS,

Respondent.

No. FDI-14-781666

**THIRD-PARTY SPARKLABS
MANAGEMENT LLC'S
OBJECTIONS AND RESPONSE TO
DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS
RECORDS TO SPARKLABS
GLOBAL VENTURES
MANAGEMENT, LLC**

Pursuant to California Code of Civil Procedure sections 2020.010 *et seq.*, Third-Party SparkLabs Management, LLC ("SparkLabs") hereby responds to Respondent Monette Stephens' ("Respondent") February 5, 2019 Deposition Subpoena for Production of Business Records ("Subpoena") served on the custodian of records for SparkLabs Global Ventures Management, LLC.

I. GENERAL RESPONSE.

1. SparkLabs' response to the Requests is made to the best of SparkLabs' present knowledge, information, and belief. This response is at all times subject to such additional or different information that discovery or further investigation may disclose and, while based on the present state of SparkLabs' recollection, is subject to such refreshing of recollection, and such

1.

1 additional knowledge of facts, as may result from SparkLabs' further discovery or investigation.
 2 SparkLabs reserves the right but assumes no responsibility to conduct further investigation or
 3 discovery.

4 2. SparkLabs will not produce documents or materials that SparkLabs deems to
 5 embody material that is private, business confidential, proprietary, trade secret, or otherwise
 6 protected from disclosure pursuant to California Constitution, article I, section 1, or California
 7 Evidence Code section 1060. Under appropriate circumstances, SparkLabs may agree to produce
 8 such documents upon the entry of, and subject to, an appropriate protective order against the
 9 unauthorized use or disclosure of such information.

10 3. SparkLabs reserves all objections or other questions as to the competency,
 11 relevance, materiality, privilege or admissibility as evidence in any subsequent proceeding in or
 12 trial of this or any other action for any purpose whatsoever of this response and any document or
 13 thing produced in response to the Requests.

14 4. SparkLabs reserves the right to object on any ground at any time to such other or
 15 supplemental demands for production as Respondent may at any time propound involving or
 16 relating to the subject matter of this Subpoena.

17 II. GENERAL OBJECTIONS.

18 SparkLabs makes the following general objections, whether or not separately set forth in
 19 response to each and every instruction, definition, and document demand made in Plaintiff's
 20 Subpoena:

21 1. SparkLabs objects generally to all Definitions, Instructions, and Requests inclusive,
 22 insofar as each such request seeks production of documents or information protected by the
 23 attorney-client privilege, the work product doctrine, or the right of privacy under the California
 24 Constitution, article I, section 1. Such documents or information shall not be produced in response
 25 to any of the Requests and any inadvertent production thereof shall not be deemed a waiver of any
 26 privilege or right with respect to such documents or information or of any work product doctrine
 27 that may attach thereto.

28 2. SparkLabs objects to the Subpoena to the extent it contains Requests duplicative of
 200514491 v1 2.

1 document requests previously served on parties to the litigation.

2 3. SparkLabs objects to all Definitions, Instructions, and Requests inclusive, to the
3 extent they purport to enlarge, expand, or alter in any way the plain meaning and scope of any
4 specific demand on the ground that such enlargement, expansion, or alteration renders said demand
5 vague, ambiguous, unintelligible, unduly broad, and uncertain.

6 4. SparkLabs objects to all Definitions, Instructions, and Requests inclusive, to the
7 extent they seek documents not currently in SparkLabs' possession, custody or control, or refer to
8 persons, entities or events not known to SparkLabs, on the grounds that such instructions,
9 definitions, or demands seek to require more of SparkLabs than any obligation imposed by law,
10 would subject SparkLabs to unreasonable and undue annoyance, oppression, burden, and expense,
11 and would seek to impose upon SparkLabs an obligation to investigate or discover information or
12 materials from third parties or services who are equally accessible to the parties to the action.

13 5. SparkLabs objects to all Requests to the extent the requested information is available
14 publicly and/or available through the parties to the litigation.

15 6. SparkLabs objects to all Definitions, Instructions, and Document Requests in which
16 the phrases "REFERRING," "RELATING TO," or "EVIDENCING" appears. The phrases
17 "REFERRING," "RELATING TO," or "EVIDENCING" are overly broad, vague, ambiguous, and
18 unintelligible, require subjective judgment on the part of SparkLabs and SparkLabs' attorneys, and
19 would require a conclusion or opinion of counsel in violation of the attorney work product doctrine.

20 7. SparkLabs objects to all definitions, instructions, and document requests in the
21 Requests to the extent that they call for the production of "all" documents or things where a
22 reasonable quantity of documents would suffice to show the pertinent information requested. To
23 the extent that SparkLabs agrees to produce documents in response to a Request seeking "all"
24 documents related to or reflecting certain information, SparkLabs will only produce documents
25 sufficient to show the pertinent information requested.

26 8. SparkLabs objects to the use of the term "DOCUMENT(S)," and to each request
27 containing that term, on the grounds that the term is overbroad, vague, ambiguous, and seeks to
28 impose an undue burden on SparkLabs.

200514491 v1

3.

1 **III. SPECIFIC OBJECTIONS AND RESPONSES TO DOCUMENT DEMANDS.**

2 Without waiving or limiting in any manner any of the foregoing General Objections, but
3 rather incorporating them into each of the following responses to the extent applicable, SparkLabs
4 responds to the specific demands of Respondent's Subpoena as follows:

5 **REQUEST FOR PRODUCTION NO. 1:**

6 Any and all documents referring and/or relating to CARL ALEXANDER WESCOTT,
7 DOB: 06/15/1967, SSN: [REDACTED], for the time period beginning 1/1/2016 through the date
8 of production.

9 **SPECIFIC OBJECTIONS TO REQUEST FOR PRODUCTION NO. 1:**

10 SparkLabs incorporates its General Responses and General Objections in response to this
11 request. SparkLabs objects: (1) to the phrases "documents", "referring", and "relating to", as
12 overbroad, vague, and ambiguous; (2) that the request is unintelligible to the extent it does not
13 include definitions of the terms "referring" and "relating"; (3) on the grounds that the Request seeks
14 information that is confidential, sensitive, or private in nature, including confidential business
15 information, or would otherwise invade the privacy rights of third parties; (4) to the extent the
16 Request seeks information that is protected by the attorney-client privilege and/or attorney work
17 product doctrine; and (5) on the grounds that the Request is overbroad, unduly burdensome,
18 oppressive, and harassing inasmuch as it is disproportionate to the needs of the case and to the
19 extent that it seeks information that is irrelevant and not reasonably calculated to lead to the
20 discovery of admissible evidence.

21 Subject to and without waiving any objections, SparkLabs answers as follows: SparkLabs
22 shall produce any and all documents concerning the terms and conditions of SparkLabs' actual or
23 potential future engagement of Mr. Wescott as a service provider, subject to redaction of
24 confidential and private information of SparkLabs and other third parties.

25 **REQUEST FOR PRODUCTION NO. 2:**

26 Any and all documents evidencing any remuneration, including but not limited to consulting
27 fees, returns on investment, dividends, stocks, stock options, and any other forms of
28 remuneration/compensation, to which CARL ALEXANDER WESCOTT, DOB: 06/15/1967, SSN:
200514491 v1

1 [REDACTED] is entitled from 1/1/2016 through the date of production.

2 **SPECIFIC OBJECTIONS TO REQUEST FOR PRODUCTION NO. 2:**

3 SparkLabs incorporates its General Responses and General Objections in response to this
 4 request. SparkLabs objects: (1) to the phrases “documents”, “evidencing”, “remuneration”,
 5 “consulting fees”, “returns on investment”, and “other forms of remuneration/compensation”, as
 6 overbroad, vague, and ambiguous; (2) that the request is unintelligible to the extent it does not
 7 include definitions of the term “evidencing”; (3) on the grounds that the Request seeks information
 8 that is confidential, sensitive, or private in nature, including confidential business information, or
 9 would otherwise invade the privacy rights of third parties; (4) to the extent the Request seeks
 10 information that is protected by the attorney-client privilege and/or attorney work product doctrine;
 11 and (5) on the grounds that the Request is overbroad, unduly burdensome, oppressive, and harassing
 12 inasmuch as it is disproportionate to the needs of the case and to the extent that it seeks information
 13 that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

14 Subject to and without waiving the foregoing objections, SparkLabs responds as follows:
 15 SparkLabs will produce all documents related to any compensation that Mr. Wescott may be
 16 entitled to in the future as part of his relationship with SparkLabs. Mr. Wescott is not currently
 17 entitled to, and is not currently receiving, any remuneration from SparkLabs.

18
 19 Dated: March 21, 2019

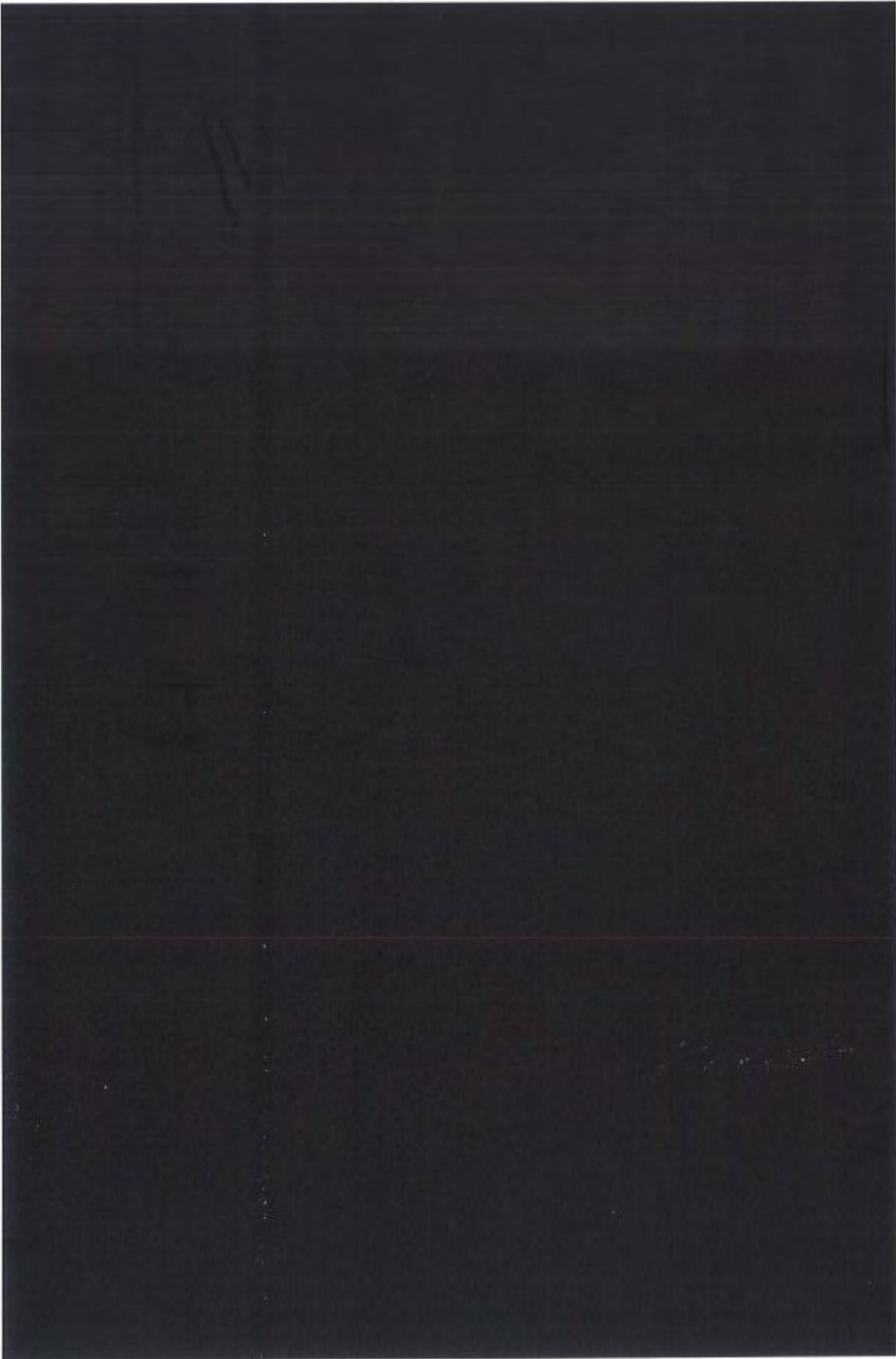
20 COOLEY LLP
 21 LESLIE V. CANCEL (160652)
 22 JOSHUA E. ELEFANT (312913)

23 By: 
 24 Joshua E. Elefant (312913)

25 Attorneys for Third-Party
 26 SPARKLABS MANAGEMENT, LLC
 27
 28

200514491 v1

5.



From: **Bernard Moon** <bernard@sparklabsglobal.com>
Date: Tue, Aug 8, 2017 at 2:22 AM

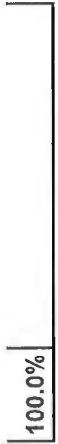
Subject: Managing Partner Role for SparkLabs IoT
To: "Carl A. Wescott" <C@carlawescott.com>

Carl,

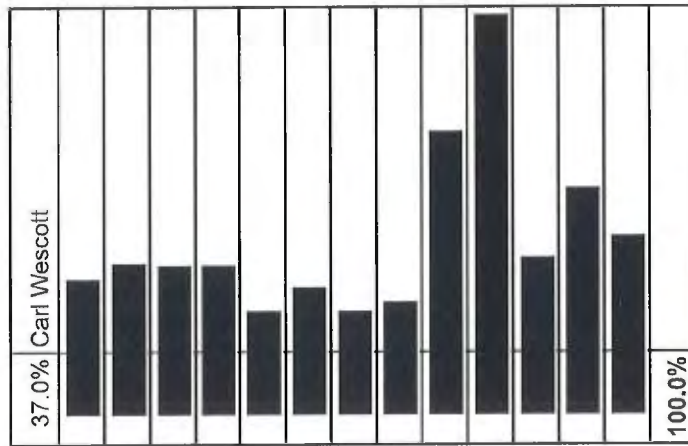
It would be awesome if you would come on board as the Managing Partner for SparkLabs IoT. I already discuss this with [REDACTED] and [REDACTED], and will soon with [REDACTED] but we know that he will agree. At this time, I would be discrete and not disclose to [REDACTED] when you see him next week. Unless [REDACTED] informs you otherwise.

As for your carried interest, this is the confidential but original allocation:

[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	
3.0% Carl Wescott	
[REDACTED]	
[REDACTED]	



We want to credit [REDACTED] with some of his carry for the 1st year, so we will let him retain [REDACTED]% vs. [REDACTED]%. I assume you basically don't need an engineering director. Maybe you might need a junior or mid-level hardware engineer, so you might have to allocate him some of your carry. We can discuss if things need to be shifted around. Here is the new carry distribution with you getting 37%:



As you know, this is the carry allocation for the 20% profit we will receive after all the principal is paid back. Let me know if you have any questions and I'll see you soon. Thanks!

Bernard

This email and any attachments thereto may contain private, confidential, and privileged material for the sole use of the intended recipient. Any review, copying, or distribution of this email (or any attachments thereto) by others is strictly prohibited. If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments thereto.

----- Forwarded message -----

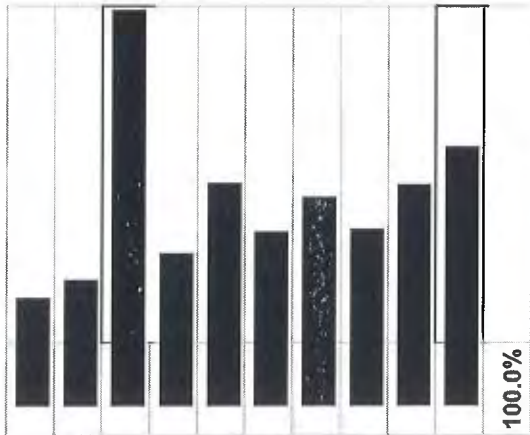
From: **Bernard Moon** <bernard@sparklabsglobal.com>
Date: Sun, Nov 11, 2018 at 5:44 PM
Subject: Carried Interest Changes for SparkLabs IoT
To: Carl Wescott <carl@sparklabsiot.com>
Cc: eugene <eugene@sparklabs.co.kr>

So I lowered the founding partners from █% to █%. Lowered Carl & Team from 44% to 42%. Then allocated █% to █, which hopefully they will accept.

Some other minor changes, such as allocating █% for the advisors since I think it's better for them to feel appreciated. Let me know if you are good with this. Thanks!

Bernard

42.0%	Carl Wescott & Team
█	
█	
█	
█	
█	
█	
█	



PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of California. I am employed in Santa Clara County, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of 18 years and not a party to this action. My business address is Cooley LLP, 3175 Hanover Street, Palo Alto, California 94304-1130. My e-mail address is dprocedo@cooley.com@cooley.com. On March 21, 2019, I served the following documents on the parties listed below in the manner(s) indicated:

**THIRD-PARTY SPARKLABS MANAGEMENT LLC'S OBJECTIONS AND
RESPONSE TO DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS
RECORDS TO SPARKLABS GLOBAL VENTURES MANAGEMENT, LLC(S)**

- ☐ (BY U.S. MAIL – CCP § 1013a(1)) I am familiar with the business practice of Cooley LLP for collection and processing of correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.
- ☐ (BY MESSENGER SERVICE – CCP § 1011) I consigned the document(s) to an authorized courier and/or process server for hand delivery on this date.
- ☐ (BY FACSIMILE – CCP § 1013(e)) I am personally and readily familiar with the business practice of Cooley LLP for collection and processing of document(s) to be transmitted by facsimile and I caused such document(s) on this date to be transmitted by facsimile to the offices of addressee(s) at the numbers listed below.
- ☒ (BY OVERNIGHT MAIL – CCP § 1013(c)) I am personally and readily familiar with the business practice of Cooley LLP for collection and processing of correspondence for overnight delivery, and I caused such document(s) described herein to be deposited for delivery to a facility regularly maintained by _____ for overnight delivery.
- ☒ (BY ELECTRONIC MAIL – CCP § 1010.6(a)(4)(A)) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused such documents described herein to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Hannah R. Salassi
Lvovich & Szucsko, P.C.
50 Osgood Place, Suite 500
San Francisco, CA 94133
hannah@landslawgroup.com

1 I declare under penalty of perjury under the laws of the State of California that the above is
2 true and correct.

3 Executed on March 21, 2019, at Palo Alto, California.

4
5 
6 Debra L. Procedo

EXHIBIT 16

AT-167/EJ-152

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): David M. Zeff, 63289 1100 Larkspur Landing Circle, Suite 350, Larkspur, Ca 94939 TELEPHONE NO.: (415) 923-1380 FAX NO.: (415) 923-1382 E-MAIL ADDRESS: dmz@zefflaw.com ATTORNEY FOR (Name): FREDERICK C. FIECHTER, Plaintiff and Judgment Creditor SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO STREET ADDRESS: 400 McAllister Street, Room 103 MAILING ADDRESS: CITY AND ZIP CODE: San Francisco 94102 BRANCH NAME:	LEVYING OFFICER (Name and Address):
PLAINTIFF/PETITIONER: FREDERICK C. FIECHTER, et al. DEFENDANT/RESPONDENT: CARL WESCOTT, et al.	LEVYING OFFICER FILE NO.:
MEMORANDUM OF GARNISHEE (Attachment-Enforcement of Judgment)	COURT CASE NO.: CPF-11-511547

NOTICE TO PERSON SERVED WITH WRIT AND NOTICE OF LEVY OR NOTICE OF ATTACHMENT: This memorandum must be completed and mailed or delivered to the levying officer within 10 days after service on you of the writ and notice of levy or attachment unless you have fully complied with the levy. Failure to complete and return this memorandum may render you liable for the costs and attorney fees incurred in obtaining the required information.

— RETURN ALL COPIES OF THIS MEMORANDUM TO THE LEVYING OFFICER —

This memorandum does not apply to garnishment of earnings.

1. a. Garnishee (name): SPARKLABS IGNITION MANAGEMENT, LLC
 b. Address: c/o CT CORPORATION, 818 W SEVENTH ST, SUITE 930, LOS ANGELES, CA 90017
2. Judgment Creditor (name): FREDERICK C. FIECHTER
3. ☒ (Check if applicable.) The garnishee holds neither any property nor any obligations in favor of the judgment debtor.
4. If you will not deliver to the levying officer any property levied upon, describe the property and the reason for not delivering it:

5. For writ of execution only. Describe any property of the judgment debtor not levied upon that is in your possession or under your control:

(Continued on reverse)

Page 1 of 2

AT-167/EJ-152

SHORT TITLE: Fiechter v. Wescott	LEVYING OFFICER FILE NO.:	CASE NUMBER: CPF-11-511547
-------------------------------------	---------------------------	-------------------------------

6. If you owe money to the judgment debtor which you will not pay to the levying officer, describe the amount and the terms of the obligation and the reason for not paying it to the levying officer:

7. Describe the amount and terms of any obligation owed to the judgment debtor that is levied upon but is not yet due and payable:

8. For writ of execution only. Describe the amount and terms of any obligation owed to the judgment debtor that is not levied upon:

9. Describe any claims and rights of other persons to the property or obligation levied upon that are known to you and the names and addresses of the other persons:

DECLARATION OF GARNISHEE

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

Yoon Kang

(TYPE OR PRINT NAME)



(SIGNATURE)

If you need more space to provide the information required by this memorandum, you may attach additional pages.

☐ Total number of pages attached:

AT-167/EJ-152

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): David M. Zeff, 63289 1100 Larkspur Landing Circle, Suite 350, Larkspur, Ca 94939 TELEPHONE NO.: (415) 923-1380 FAX NO.: (415) 923-1382 E-MAIL ADDRESS: dmz@zefflaw.com ATTORNEY FOR (Name): FREDERICK C. FIECHTER, Plaintiff and Judgment Creditor	LEVYING OFFICER (Name and Address):
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO STREET ADDRESS: 400 McAllister Street, Room 103 MAILING ADDRESS: CITY AND ZIP CODE: San Francisco 94102 BRANCH NAME:	
PLAINTIFF/PETITIONER: FREDERICK C. FIECHTER, et al. DEFENDANT/RESPONDENT: CARL WESCOTT, et al.	LEVYING OFFICER FILE NO.:
MEMORANDUM OF GARNISHEE (Attachment—Enforcement of Judgment)	COURT CASE NO.: CPF-11-511547

NOTICE TO PERSON SERVED WITH WRIT AND NOTICE OF LEVY OR NOTICE OF ATTACHMENT: This memorandum must be completed and mailed or delivered to the levying officer within 10 days after service on you of the writ and notice of levy or attachment unless you have fully complied with the levy. Failure to complete and return this memorandum may render you liable for the costs and attorney fees incurred in obtaining the required information.

— RETURN ALL COPIES OF THIS MEMORANDUM TO THE LEVYING OFFICER —

This memorandum does *not* apply to garnishment of earnings.

1. a. Garnishee (name): SPARKLABS VENTURES IGNITION FUND, LP
 b. Address: c/o CT CORPORATION, 818 W SEVENTH ST, SUITE 930, LOS ANGELES, CA 90017
2. Judgment Creditor (name): FREDERICK C. FIECHTER
3. ☒ (Check if applicable.) The garnishee holds neither any property nor any obligations in favor of the judgment debtor.
4. If you will not deliver to the levying officer any property levied upon, describe the property and the reason for not delivering it:
5. For writ of execution only. Describe any property of the judgment debtor not levied upon that is in your possession or under your control:

(Continued on reverse)

Page 1 of 2

AT-167/EJ-152

SHORT TITLE: Fiechter v. Wescott	LEVYING OFFICER FILE NO.:	CASE NUMBER: CPF-11-511547
-------------------------------------	---------------------------	-------------------------------

6. If you owe money to the judgment debtor which you will not pay to the levying officer, describe the amount and the terms of the obligation and the reason for not paying it to the levying officer:

7. Describe the amount and terms of any obligation owed to the judgment debtor that is levied upon but is not yet due and payable:

8. For writ of execution only. Describe the amount and terms of any obligation owed to the judgment debtor that is not levied upon:

9. Describe any claims and rights of other persons to the property or obligation levied upon that are known to you and the names and addresses of the other persons:

DECLARATION OF GARNISHEE

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

Yoon Kang

(TYPE OR PRINT NAME)



(SIGNATURE)

If you need more space to provide the information required by this memorandum, you may attach additional pages.

☐ Total number of pages attached:

AT-167/EJ-152

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO STREET ADDRESS: 400 McAllister Street, Room 103 MAILING ADDRESS: CITY AND ZIP CODE: San Francisco 94102 BRANCH NAME:	
PLAINTIFF/PETITIONER: FREDERICK C. FIECHTER, et al. DEFENDANT/RESPONDENT: CARL WESCOTT, et al.	LEVYING OFFICER FILE NO.:
MEMORANDUM OF GARNISHEE (Attachment—Enforcement of Judgment)	COURT CASE NO.: CPF-11-511547

NOTICE TO PERSON SERVED WITH WRIT AND NOTICE OF LEVY OR NOTICE OF ATTACHMENT: This memorandum must be completed and mailed or delivered to the levying officer within 10 days after service on you of the writ and notice of levy or attachment unless you have fully complied with the levy. Failure to complete and return this memorandum may render you liable for the costs and attorney fees incurred in obtaining the required information.

— RETURN ALL COPIES OF THIS MEMORANDUM TO THE LEVYING OFFICER —

This memorandum does *not* apply to garnishment of earnings.

1. a. Garnishee (name): SPARKLABS VENTURES IGNITION GP, LP
 b. Address: c/o CT CORPORATION, 818 W SEVENTH ST, SUITE 930, LOS ANGELES, CA 90017
2. Judgment Creditor (name): FREDERICK C. FIECHTER
3. ☒ (Check if applicable.) The garnishee holds neither any property nor any obligations in favor of the judgment debtor.
4. If you will not deliver to the levying officer any property levied upon, describe the property and the reason for not delivering it:

5. For writ of execution only. Describe any property of the judgment debtor not levied upon that is in your possession or under your control:

(Continued on reverse)

Page 1 of 2

AT-167/EJ-152

SHORT TITLE: Fiechter v. Wescott	LEVYING OFFICER FILE NO.:	CASE NUMBER: CPF-11-511547
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6. If you owe money to the judgment debtor which you will not pay to the levying officer, describe the amount and the terms of the obligation and the reason for not paying it to the levying officer:

7. Describe the amount and terms of any obligation owed to the judgment debtor that is levied upon but is not yet due and payable:

8. For writ of execution only. Describe the amount and terms of any obligation owed to the judgment debtor that is not levied upon:

9. Describe any claims and rights of other persons to the property or obligation levied upon that are known to you and the names and addresses of the other persons:

DECLARATION OF GARNISHEE

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

Yoon Kang
(TYPE OR PRINT NAME)


(SIGNATURE)

If you need more space to provide the information required by this memorandum, you may attach additional pages.

☐ Total number of pages attached:

AT-167/EJ-152

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): David M. Zeff, 63289 1100 Larkspur Landing Circle, Suite 350, Larkspur, Ca 94939 TELEPHONE NO.: (415) 923-1380 FAX NO.: (415) 923-1382 E-MAIL ADDRESS: dmz@zefflaw.com ATTORNEY FOR (Name): FREDERICK C. FIECHTER, Plaintiff and Judgment Creditor		LEVYING OFFICER (Name and Address):
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO STREET ADDRESS: 400 McAllister Street, Room 103 MAILING ADDRESS: CITY AND ZIP CODE: San Francisco 94102 BRANCH NAME:		
PLAINTIFF/PETITIONER: FREDERICK C. FIECHTER, et al. DEFENDANT/RESPONDENT: CARL WESCOTT, et al.		LEVYING OFFICER FILE NO.:
MEMORANDUM OF GARNISHEE (Attachment—Enforcement of Judgment)		COURT CASE NO.: CPF-11-511547

NOTICE TO PERSON SERVED WITH WRIT AND NOTICE OF LEVY OR NOTICE OF ATTACHMENT: This memorandum must be completed and mailed or delivered to the levying officer within 10 days after service on you of the writ and notice of levy or attachment unless you have fully complied with the levy. Failure to complete and return this memorandum may render you liable for the costs and attorney fees incurred in obtaining the required information.

**This memorandum does not apply
to garnishment of earnings.**

1. a. Garnishee (name): **BERNARD MOON**
b. Address: **3587 Lupine Ave., Palo Alto, CA 94303**
2. Judgment Creditor (name): **FREDERICK C. FIECHTER**
3. ☒ (Check if applicable.) The garnishee holds neither any property nor any obligations in favor of the judgment debtor.
4. If you will not deliver to the levying officer any property levied upon, describe the property and the reason for not delivering it:

Garnishee is not a judgment debtor in this matter. Garnishee is not in possession of any property or obligations in favor of Carl Wescott.
5. For writ of execution only. Describe any property of the judgment debtor not levied upon that is in your possession or under your control:

(Continued on reverse)

Page 1 of 2

AT-187/EJ-152

SHORT TITLE: Fiechter v. Wescott	LEVYING OFFICER FILE NO.:	CASE NUMBER: CPF-11-511547
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6. If you owe money to the judgment debtor which you will not pay to the levying officer, describe the amount and the terms of the obligation and the reason for not paying it to the levying officer:

None

7. Describe the amount and terms of any obligation owed to the judgment debtor that is levied upon but is not yet due and payable:

None

8. For writ of execution only. Describe the amount and terms of any obligation owed to the judgment debtor that is not levied upon:

9. Describe any claims and rights of other persons to the property or obligation levied upon that are known to you and the names and addresses of the other persons:

None

DECLARATION OF GARNISHEE

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

Bernard B. Moon
(TYPE OR PRINT NAME)

Bernard B. Moon
(SIGNATURE)

If you need more space to provide the information required by this memorandum, you may attach additional pages.

☐ Total number of pages attached:

PROOF OF SERVICE

I, **Brenda Martinez-Eby**, declare as follows: I am a citizen of the United States, over the age of eighteen years and not a party to the within entitled action. My business address is Gluck Daniel LLP, One Sansome Street, Suite 720, San Francisco, California 94104. I served the attached paper identified below on the interested parties in said action, by placing a true copy thereof in sealed envelope(s) addressed as indicated and served the named document in the manner indicated below

**MEMORANDUM OF GARNISHEE
(Attachment-Enforcement of Judgment)**

Service upon:

David M. Zeff, Esq.
1100 Larkspur Circle, Suite 350
Larkspur, CA 94939
Tel.: (415) 923-1380
Fax: (415) 923-1382
Email: dmz@zefflaw.com

*Attorney for Plaintiff and Judgment Creditor
FREDERICK C. FIECHTER*

- ☒ **BY MAIL:** I caused true and correct copies of the above document(s) to be served by mail on the above date by personally placing and sealing said document(s) in an envelope or package suitable for mailing, addressed to the addressee(s) and including this firm's return address, and then, following ordinary office practice, placing said sealed envelope in the office's usual location for collection and mailing with the United States Postal Service.
- ☐ **BY NEXT-DAY OVERNIGHT SERVICE:** I caused true and correct copies of the above document(s) to be placed within a sealed envelope or other package suitable for overnight shipment, addressed to the addressee(s) and including this firm's return address, and delivered on the date stated above to an overnight delivery service for delivery to the addressee(s) on the following business day.
- ☐ **BY HAND DELIVERY:** I caused true and correct copies of the above document(s) to be placed within a sealed envelope or other package suitable for handling by a messenger or courier service and then caused the package to be hand-delivered by a same-day messenger service to the addressee(s) on this date.
- ☒ **BY EMAIL:** I caused true and correct copies of the above document(s) to be sent via email to the addressee(s) on this date. I did not receive a notice indicating delivery failure.
- ☐ **BY E-SERVICE:** I caused true and correct copies of the above document(s) to be sent via electronic transmission through the Court's E-service vendor in conformity with San Francisco Superior Court Local Rule 2.10 in transaction number XXX.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed **July 29, 2019**, at San Francisco, California.


Brenda Martinez-Eby

EXHIBIT 17

ARTICLES OF INCORPORATION
Side Coast, Inc.

1) NAME:

The name of this corporation is **Side Coast, Inc.**

2) PURPOSE:

The purpose of the corporation is to engage in any lawful act or activity for which a corporation may be organized under the **GENERAL CORPORATION LAW** of California other than the banking business, the trust company business or the practice of a profession permitted to be incorporated by the California Corporations Code.

3) AGENT FOR SERVICE OF PROCESS:

The name and address in the State of California of this corporation's initial agent for service of process is:

Name **PERCY HAULUND**
 2929 190th Street
 Redondo Beach CA 90278

4) ADDRESSES:

2929 190th Street Redondo Beach CA 90278 is also the corporation's initial physical address.

However, the mailing address of Side Coast, Inc., is **PO Box 1304, Sausalito, CA 94966**.

5) STOCK:

This corporation is authorized to issue only one class of shares of stock which shall be designated common stock. The total number of shares it is authorized to issue is **Two Hundred Million Shares (200,000,000)**.

6) DIRECTOR(S):

The name and address of the person who is appointed to act as the initial director of this corporation is:

Name **Carl Wescott**
 PO Box 1304
 Sausalito, CA 94966

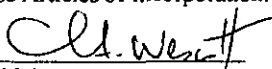
7) LIABILITY:

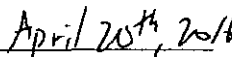
The liability of the director(s) of the corporation for monetary damages shall be eliminated to the fullest extent permissible under California law.

8) INDEMNIFICATION:

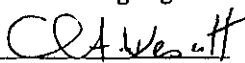
The corporation is authorized to indemnify the directors and officers of the corporation to the fullest extent permissible under California law.

IN WITNESS WHEREOF, the undersigned, being all the person named above as the initial director(s), have executed these Articles of Incorporation.


Carl Wescott


Date

The undersigned, being all the persons named above as the initial director(s), declare that they are the person(s) who executed the foregoing Articles of Incorporation, which execution is their act and deed.


Carl Wescott


Date

FILED
Secretary of State
State of California
APR 22 2016
4
PS

EXHIBIT 18

FILED

JUL 10 2017

UNITED STATES BANKRUPTCY COURT
SAN FRANCISCO, CA

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re CARL ALEXANDER WESLOTT,
Debtor

Case No. 12-30143
Dm

my new address is

Carl A. Weslott
PO BOX 1304
JAWAHLITO, CA 94966

Thank you!

Carl A. Weslott

7/10/2017

EXHIBIT 19

FILED

MAR 28 2019

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CV 19 1640

KAW

Carl A. Wescott

Plaintiff,

CASE NO. _____

vs.

APPLICATION TO PROCEED
IN FORMA PAUPERIS

Jim Upshaw, UPSI, Chris Patterson
+ DOES 1 to 25

Defendant.

I, Carl A. Wescott, declare, under penalty of perjury that I am the plaintiff in the above entitled case and that the information I offer throughout this application is true and correct. I offer this application in support of my request to proceed without being required to prepay the full amount of fees, costs or give security. I state that because of my poverty I am unable to pay the costs of this action or give security, and that I believe that I am entitled to relief.

In support of this application, I provide the following information:

1. Are you presently employed?

No NO

If your answer is "yes," state both your gross and net salary or wages per month, and give the name and address of your employer:

Gross: _____ Net: _____

Employer: _____

If the answer is "no," state the date of last employment and the amount of the gross and net salary

and wages per month which you received.

My last job that did not involve golden handcuffs (2000) or an officer position (2003) was a software engineer position in 1990 in which I earned \$2000 pre-tax per month.

I last earned money in 2014 when I earned less than \$6,000 for the year.*

*I did generate \$5,000 of income in December 2018, paid in February 2019, as a sole proprietor, but it cost me approximately \$15,000 (to be reconciled when all expenses come in) to earn that money, and thus it was actually a loss of approximately \$10,000 (exact number TBD)

2. Have you received, within the past twelve (12) months, any money from any of the following sources:

- | | | |
|----|--|--|
| a. | Business, Profession or self employment? | Yes. See * above. |
| b. | Income from stocks, bonds, or royalties? | No |
| c. | Rent payments? | No |
| d. | Pensions, annuities, or life insurance payments? | No |
| e. | Federal or State welfare payments, | No, except that I receive EBT/CalFresh/food stamps |

If the answer is "yes" to any of the above, describe each source of money and state the amount received from each.

See * above regarding the only self-employment income I have had since August 2014.

Regarding EBT/CalFresh/food stamps, I receive \$194 per month in food benefits

3. Are you married? No! (divorced)

[spousal questions removed to make room for longer answers elsewhere on page]

4. a. List amount you contribute to your spouse's support: \$0 (last support payment made was June 2014)

b. List the persons other than your spouse who are dependent upon you for support and indicate how much you contribute toward their support. (NOTE: For minor

1 children, list only their initials and ages. DO NOT INCLUDE THEIR NAMES.)
2 AW, 13 (\$0), CW, 11 (\$0), DW (\$0) Last support payment I was able to make was also June 2014
3 _____
4 5. Do you own or are you buying a home? No
5
6 6. Do you own an automobile? No**
7 Make _____ Year _____ Model _____
8 **I used to own a suspended LLC which owns a car that was impounded in June 2016
9
10 7. Do you have a bank account? Yes and No (Do not include account #s)
11 Name(s) and address(es) of bank: I only have one personal bank account in the world, in
Ecuador with Banco Pichincha. It has less than US \$100 in it.
12 I do use a corporate bank account from time to time
13 Present balance(s): \$ The Banco Pichincha account has less than \$100
14 Do you own any cash? Yes Amount: US \$308 + 30 South African rand (plus ~\$25 in change)
15 Do you have any other assets? (If "yes," provide a description of each asset and its estimated
16 market value.) Yes !
17 My main asset is legal claims. I own 3 guitars, some old cell phones, lots of clothes, and many
Books. The guitars may be worth \$100 to \$200 each, the old cell phones perhaps \$100 to \$200 ea.
18 8. What are your monthly expenses?
19 Rent: \$ n/a (homeless) Utilities: \$130 (cell phone bill)
20 Food: \$ 400 Clothing: \$50
21 Charge Accounts: not applicable, credit ruined by bankruptcy
22

Name of Account	Monthly Payment	Total Owed on This Account
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____

23
24
25
26 9. Do you have any other debts? (List current obligations, indicating amounts and to whom
27 they are payable. Do not include account numbers.)
28 I have huge debts which total over US \$200 million, as detailed in my chapter 7

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10. Does the complaint which you are seeking to file raise claims that have been presented in other lawsuits? No

Please list the case name(s) and number(s) of the prior lawsuit(s), and the name of the court in which they were filed.

N/A

I declare under the penalty of perjury that the foregoing is true and correct and understand that a false statement herein may result in the dismissal of my claims.

3/28/2019

DATE

[Signature]

SIGNATURE OF APPLICANT

EXHIBIT 20

Clear Form

FILED

APR 17 2019

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CV 19-2084 JST

Plaintiff,

CASE NO. _____

vs.

APPLICATION TO PROCEED
IN FORMA PAUPERIS

(Non-prisoner cases only)

Defendant.

I, CARL WESCH, declare, under penalty of perjury that I am the plaintiff in the above entitled case and that the information I offer throughout this application is true and correct. I offer this application in support of my request to proceed without being required to prepay the full amount of fees, costs or give security. I state that because of my poverty I am unable to pay the costs of this action or give security, and that I believe that I am entitled to relief.

In support of this application, I provide the following information:

1. Are you presently employed? Yes ___ No ☒

If your answer is "yes," state both your gross and net salary or wages per month, and give the name and address of your employer:

Gross: _____ Net: _____

Employer: N/A

If the answer is "no," state the date of last employment and the amount of the gross and net salary

1 and wages per month which you received.

2 _____
3 _____
4 _____
5 2. Have you received, within the past twelve (12) months, any money from any of the
6 following sources:

- 7 a. Business, Profession or Yes ☒ No _____
8 self employment?
9 b. Income from stocks, bonds, Yes _____ No _____
10 or royalties?
11 c. Rent payments? Yes _____ No _____
12 d. Pensions, annuities, or Yes _____ No _____
13 life insurance payments?
14 e. Federal or State welfare payments, Yes _____ No _____
15 Social Security or other govern-
16 ment source?

17 If the answer is "yes" to any of the above, describe each source of money and state the amount
18 received from each.

19 I RECEIVED \$5,000 in the last 12 months from
20 ~~CONJUGAL~~ CONSORTING. THAT IS MY TOTAL EARNED INCOME
21 SINCE 9/1/2017.

22 3. Are you married? Yes _____ No ☒

23 Spouse's Full Name: _____

24 Spouse's Place of Employment: _____

25 Spouse's Monthly Salary, Wages or Income:

26 Gross \$ _____ Net \$ _____

27 4. a. List amount you contribute to your spouse's support: \$ 0

28 b. List the persons other than your spouse who are dependent upon you for support
and indicate how much you contribute toward their support. (NOTE: For minor

children, list only their initials and ages. DO NOT INCLUDE THEIR NAMES.)

AW 13 CW 11 DW 9

5. Do you own or are you buying a home? Yes ☒ No ☐

Estimated Market Value: \$ _____ Amount of Mortgage: \$ _____

6. Do you own an automobile? Yes ☐ No ☒

Make _____ Year _____ Model BMW 320i FOR VETAS, OWNS A 2007

Is it financed? Yes ☐ No ☐ If so, Total due: \$ 12,500 THAT WAS IMPROVED

Monthly Payment: \$ _____

7. Do you have a bank account? Yes ☒ No ☐ (Do not include account numbers.)

Name(s) and address(es) of bank: BANCO PICHINCHA

QUITO ECUADOR

Present balance(s): \$ less than 100 LAST TIME I CHECKED ABOUT 8 YEARS AGO

Do you own any cash? Yes ☒ No ☐ Amount: \$ probably \$6 in change

Do you have any other assets? (If "yes," provide a description of each asset and its estimated market value.) Yes ☒ No ☐

LEGAL CLAIMS ARE MY ONLY SIGNIFICANT ASSET

8. What are your monthly expenses?

Rent: \$ 0 (homeless - I CRASH IN AVE OFFICE) Utilities: 125

Food: \$ 300 Clothing: 100

Charge Accounts:

Name of Account	Monthly Payment	Total Owed on This Account
_____	\$ <u>N/A</u>	\$ _____
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____

9. Do you have any other debts? (List current obligations, indicating amounts and to whom they are payable. Do not include account numbers.) PRINCIPAL OF \$70 MIL (\$700,000)
w/ interest not due before in 2014 ch. 7. 12-10-17

* I DO NOT OWN A HOME. I SIGNED A CONTRACT TO PURCHASE A HOME - 3 FOR 12,500 IN PICHINCHA. SELLER HAS NOT SIGNED.

10. Does the complaint which you are seeking to file raise claims that have been presented in other lawsuits? Yes ___ No ✓ *Not against these defendants*

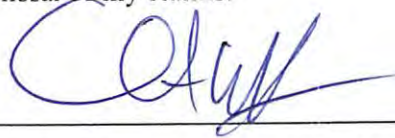
Please list the case name(s) and number(s) of the prior lawsuit(s), and the name of the court in which they were filed.

*Related case in SF Superior Court JS8198
CC-17-~~1121~~*

I declare under the penalty of perjury that the foregoing is true and correct and understand that a false statement herein may result in the dismissal of my claims.

*As of
4/14/2019*

DATE



SIGNATURE OF APPLICANT

Resigned 4/17/2019

EXHIBIT 21

Platform	Created Date	USD Equivalent	CR	Local	Balance Impact	Transaction Type	Status	Notes	Counterparty Name	Counterparty Email	Counterparty Txn ID	Counterparty	Month	Year	isSuccessful
PAYPAL	07-04-2018 17:05:55	\$25.00		\$25.00	USD CR	Mobile Payment	Completed	Dead & Co, remaining balance Thanks again, Carl! Just got the tickets	Andrew Swett	aswett07@gmail.com	19479086554786810	Verified	July	2018	TRUE
PAYPAL	10-04-2018 16:04:41	\$210.00		\$210.00	USD CR	General Payment	Completed	for Miss Saigon today. :-)	Angela Ha	ha.angela@yahoo.com	19580257736988339	Verified	October	2018	TRUE
PAYPAL	06-17-2018 09:30:40	\$500.00		\$500.00	USD CR	Payment Refund	Pending	sorry i missed you in sf	Anthony Turino	anthonyturino@gmail.com	19460259451286258	Verified	June	2018	FALSE
PAYPAL	06-17-2018 09:30:40	\$500.00		\$500.00	USD CR	Payment Refund	Completed	sorry i missed you in sf	Anthony Turino	anthonyturino@gmail.com	19460259451286258	Verified	June	2018	TRUE
PAYPAL	08-08-2018 16:43:53	\$131.00		\$131.00	USD CR	General Payment	Completed		Anthony Turino	anthonyturino@gmail.com	19517584309978360	Verified	August	2018	TRUE
PAYPAL	08-08-2018 18:29:31	\$131.00		\$131.00	USD CR	Mobile Payment	Completed		Anthony Turino	anthonyturino@gmail.com	19517768721691621	Verified	August	2018	TRUE
PAYPAL	09-20-2018 17:25:22	\$3,500.00		\$3,500.00	USD CR	Mobile Payment	Completed		Anthony Turino	anthonyturino@gmail.com	19564866940777232	Verified	September	2018	TRUE
PAYPAL	11-27-2018 17:59:46	\$200.00		\$200.00	USD CR	General Payment	Completed		Anthony Turino	anthonyturino@gmail.com	19639819924743801	Verified	November	2018	TRUE
PAYPAL	02-10-2019 12:27:53	\$23.00		\$23.00	USD CR	General Payment	Completed		Anthony Turino	anthonyturino@gmail.com	19722082744856234	Verified	February	2019	TRUE
PAYPAL	11-01-2017 14:08:06	\$79.99		\$79.99	USD CR	Payment Refund	Completed		B&H Foto & Electronics Corp	paypal@bhphoto.com	19209724161612024	Verified	November	2017	TRUE
PAYPAL	02-20-2019 19:34:22	\$855.00		\$855.00	USD CR	General Payment	Completed		Bernard Moon	bernard@sparklabsglobal.com	19733084129620911	Verified	February	2019	TRUE
PAYPAL	03-18-2019 12:03:31	\$1,100.00		\$1,100.00	USD CR	General Payment	Completed		Bernard Moon	bernard@sparklabsglobal.com	19761666042045073	Verified	March	2019	TRUE
PAYPAL	04-14-2019 23:53:56	\$1,541.66		\$1,541.66	USD CR	General Payment	Completed		Bernard Moon	bernard@sparklabsglobal.com	19791350604503614	Verified	April	2019	TRUE
PAYPAL	01-05-2019 13:30:06	\$36.00		\$36.00	USD CR	General Payment	Completed	I really appreciate the Laurie Anderson ticket! Once in a lifetime show!	catherine lee	videovision_cml@yahoo.com	19682504398339413	Verified	January	2019	TRUE
PAYPAL	08-15-2018 10:38:06	\$1,000.00		\$1,000.00	USD CR	General Payment	Completed		Daniel Anderson	danandersonmobile@yahoo.com	19525272005355213	Verified	August	2018	TRUE
PAYPAL	09-17-2017 07:30:38	\$54.00		\$54.00	USD CR	Mobile Payment	Completed		Elite Snowboard Services	jaytierney@hotmail.com	19160225476951129	Verified	September	2017	TRUE
PAYPAL	09-13-2017 14:46:00	\$63.00		\$63.00	USD CR	General Payment	Completed	Thanks for supporting live music always	Henry Heikkinen	henryh@livefunk.com	19155841945384870	Verified	September	2017	TRUE
PAYPAL	09-26-2018 21:55:52	\$60.00		\$60.00	USD CR	General Payment	Completed		Henry Petras	henrypetras@hotmail.com	19571442596345690	Verified	September	2018	TRUE
PAYPAL	10-06-2017 17:56:36	\$23.97		\$23.97	USD CR	Mobile Payment	Completed	Reimbursement for not getting the	Jenny Phu	jennyphu@gmail.com	19181121908986807	Verified	October	2017	TRUE
PAYPAL	01-26-2018 14:43:55	\$200.00		\$200.00	USD CR	General Payment	Completed		Jeremy Kee	jeremykeecorp@gmail.com	19304269696746155	Verified	January	2018	TRUE
PAYPAL	01-21-2019 10:16:34	\$20.00		\$20.00	USD CR	General Payment	Completed		Jeremy Kee	jeremykeecorp@gmail.com	19700272542251513	Verified	January	2019	TRUE
PAYPAL	02-26-2019 11:15:10	\$291.00		\$291.00	USD CR	General Payment	Completed	Hi Carl, Sorry the upgrade did not work out. Here's the funds back minus the paypal fee. Hope you have a safe trip	John Cashman	jcashman09@gmail.com	19739681992213496	Verified	February	2019	TRUE
PAYPAL	11-29-2017 18:22:33	\$175.00		\$175.00	USD CR	General Payment	Completed		Jonas Goodman	jonasgoodman@gmail.com	19240688429258693	Verified	November	2017	TRUE
PAYPAL	12-19-2017 13:07:51	\$200.00		\$200.00	USD CR	General Payment	Completed		Jonas Goodman	jonasgoodman@gmail.com	19262671882160899	Verified	December	2017	TRUE
PAYPAL	01-24-2018 13:01:45	\$100.00		\$100.00	USD CR	General Payment	Completed		Jonas Goodman	jonasgoodman@gmail.com	19302075070066006	Verified	January	2018	TRUE
PAYPAL	05-24-2018 14:44:16	\$85.00		\$85.00	USD CR	General Payment	Completed	books	Jonas Goodman	jonasgoodman@gmail.com	19434058926212274	Verified	May	2018	TRUE
PAYPAL	05-29-2018 22:50:09	\$100.00		\$100.00	USD CR	General Payment	Completed	more books	Jonas Goodman	jonasgoodman@gmail.com	19439571595304294	Verified	May	2018	TRUE
PAYPAL	06-02-2018 00:39:25	\$50.00		\$50.00	USD CR	General Payment	Completed	half (almost) of third shipment of books	Jonas Goodman	jonasgoodman@gmail.com	19443969873073468	Verified	June	2018	TRUE
PAYPAL	01-07-2019 19:44:51	\$1,062.50		\$1,062.50	USD CR	General Payment	Completed		Jonas Goodman	jonasgoodman@gmail.com	19684637340093124	Verified	January	2019	TRUE
PAYPAL	08-26-2018 22:41:19	\$71.00		\$71.00	USD CR	General Payment	Completed		Jonathan Cifuentes	cifuentj@gmail.com	19537368452692079	Verified	August	2018	TRUE
PAYPAL	07-28-2018 16:51:13	\$162.00		\$162.00	USD CR	General Payment	Completed		Laurie Etheridge	laurieetheridge@yahoo.com	19505665612906796	Verified	July	2018	TRUE
PAYPAL	08-15-2018 11:35:09	\$1,000.00		\$1,000.00	USD CR	Mobile Payment	Completed		Michael Shea	chetvancouver@yahoo.com	19525276781604099	Verified	August	2018	TRUE
PAYPAL	08-29-2018 20:13:57	\$1,500.00		\$1,500.00	USD CR	Mobile Payment	Completed		Michael Shea	chetvancouver@yahoo.com	19540661340263263	Verified	August	2018	TRUE
PAYPAL	06-27-2018 23:02:09	\$1,000.00		\$1,000.00	USD CR	General Payment	Completed		Nicole Wescott	notnicoleagain@hotmail.com	19471389217064594	Verified	June	2018	TRUE
PAYPAL	06-28-2018 19:54:11	\$1,000.00		\$1,000.00	USD CR	General Payment	Completed		Nicole Wescott	notnicoleagain@hotmail.com	19472682248731344	Verified	June	2018	TRUE
PAYPAL	10-19-2017 15:24:07	\$1.00		\$1.00	USD CR	Payment Refund	Completed		Olga Africawala	savoaf@yahoo.com	141894882807	Verified	October	2017	TRUE
PAYPAL	04-22-2018 21:41:03	\$266.00		\$266.00	USD CR	Payment Refund	Completed		Olga Africawala	savoaf@yahoo.com	19398839675458021	Verified	April	2018	TRUE
PAYPAL	04-22-2018 21:41:22	\$50.00		\$50.00	USD CR	Payment Refund	Completed		Olga Africawala	savoaf@yahoo.com	19398839675477275	Verified	April	2018	TRUE
PAYPAL	06-17-2018 19:08:21	\$50.00		\$50.00	USD CR	General Payment	Completed		Olga Africawala	savoaf@yahoo.com	19460587361019105	Verified	June	2018	TRUE
PAYPAL	08-15-2018 10:24:29	\$100.00		\$100.00	USD CR	General Payment	Completed		Olga Africawala	savoaf@yahoo.com	19525284173318623	Verified	August	2018	TRUE
PAYPAL	09-30-2018 18:47:28	\$42.00		\$42.00	USD CR	General Payment	Completed		Olga Africawala	savoaf@yahoo.com	19575846791041730	Verified	September	2018	TRUE
PAYPAL	08-08-2018 18:58:57	\$50.00		\$50.00	USD CR	Mobile Payment	Pending		peter koufis' Store	peterck@greenerlatitudes.com	19517630172063681	Verified	August	2018	FALSE
PAYPAL	08-08-2018 18:58:57	\$50.00		\$50.00	USD CR	Mobile Payment	Completed		peter koufis' Store	peterck@greenerlatitudes.com	19517630172063681	Verified	August	2018	TRUE
PAYPAL	08-09-2018 14:22:20	\$50.00		\$50.00	USD CR	Mobile Payment	Completed	Carl, Here is August payment \$50E-	peter koufis' Store	peterck@greenerlatitudes.com	19518664438424168	Verified	August	2018	TRUE
PAYPAL	09-25-2018 18:43:11	\$85.00		\$85.00	USD CR	General Payment	Completed	check expected August 14th \$50	Raman Frey	ramanfrey@gmail.com	19570537986631303	Verified	September	2018	TRUE
PAYPAL	04-26-2019 16:59:36	\$147.00		\$147.00	USD CR	General Payment	Completed	For dinner on Sunday	randy vogel	randy@ntth.com	19804746851104040	Verified	April	2019	TRUE
PAYPAL	03-05-2018 13:43:18	\$25.00		\$25.00	USD CR	General Payment	Completed	Shipping tags and for any ancillary	Rene Torres	rtorresphd@hotmail.com	19346059848885198	Verified	March	2018	TRUE
PAYPAL	07-10-2018 17:15:33	\$25.00		\$25.00	USD CR	General Payment	Completed		robert block	rjrbj1@gmail.com	19485701887778165	Verified	July	2018	TRUE
PAYPAL	08-09-2018 16:35:05	\$200.00		\$200.00	USD CR	General Payment	Completed		robert block	rjrbj1@gmail.com	19518683945143971	Verified	August	2018	TRUE
PAYPAL	09-25-2018 12:07:49	\$100.00		\$100.00	USD CR	General Payment	Completed		robert block	rjrbj1@gmail.com	19570365132792613	Verified	September	2018	TRUE
PAYPAL	09-25-2018 15:57:01	\$300.00		\$300.00	USD CR	General Payment	Completed		robert block	rjrbj1@gmail.com	19570352835589635	Verified	September	2018	TRUE
PAYPAL	10-06-2018 15:16:22	\$100.00		\$100.00	USD CR	General Payment	Completed		robert block	rjrbj1@gmail.com	19582439084797968	Verified	October	2018	TRUE
PAYPAL	03-21-2018 21:42:07	\$45.00		\$45.00	USD CR	General Payment	Completed	Thanks, Carl! - Elias	Shannel Busuio	shannelb-10@sandiego.edu	19363638992556922	Verified	March	2018	TRUE
PAYPAL	11-07-2018 09:31:37	\$500.00		\$500.00	USD CR	General Payment	Completed		Shelley Alger Photography	shelleyalger@gmail.com	19617810221505228	Verified	November	2018	TRUE
PAYPAL	01-14-2019 11:30:46	\$69.03		\$67.00	USD CR	Mobile Payment	Completed	Paid in Phil	Trent Clingan	thclingan13@gmail.com	19692586563920090	Verified	January	2019	TRUE
PAYPAL	10-19-2017 12:10:20	\$1,500.00		\$1,500.00	USD CR	General Payment	Completed		William Russ	texfix@toast.net	19195417524114157	Verified	October	2017	TRUE
PAYPAL	11-22-2017 12:31:32	\$1,000.00		\$1,000.00	USD CR	General Payment	Completed		William Russ	texfix@toast.net	19232798449662215	Verified	November	2017	TRUE
PAYPAL	11-30-2017 09:58:57	\$1,000.00		\$1,000.00	USD CR	General Payment	Completed		William Russ	texfix@toast.net	19241776825945935	Verified	November	2017	TRUE
PAYPAL	12-06-2017 14:45:55	\$2,000.00		\$2,000.00	USD CR	General Payment	Completed		William Russ	texfix@toast.net	19248385035218571	Verified	December	2017	TRUE
PAYPAL	12-15-2017 07:33:10	\$2,630.00		\$2,630.00	USD CR	General Payment	Completed		William Russ	texfix@toast.net	19258095393817468	Verified	December	2017	TRUE
PAYPAL	01-03-2018 11:16:03	\$2,500.00		\$2,500.00	USD CR	General Payment	Completed		William Russ	texfix@toast.net	19278983456624678	Verified	January	2018	TRUE
PAYPAL	01-16-2018 11:48:05	\$2,500.00		\$2,500.00	USD CR	General Payment	Completed		William Russ	texfix@toast.net	19293278274304590	Verified	January	2018	TRUE
PAYPAL	02-01-2018 15:43:07	\$2,500.00		\$2,500.00	USD CR	General Payment	Completed		William Russ	texfix@toast.net	19310867344371047	Verified	February	2018	TRUE
PAYPAL	02-15-2018 07:50:04	\$2,500.00		\$2,500.00	USD CR	General Payment	Completed		William Russ	texfix@toast.net	19326256439600396	Verified	February	2018	TRUE
PAYPAL	03-05-2018 12:01:20	\$1,000.00		\$1,000.00	USD CR	General Payment	Completed		William Russ	texfix@toast.net	19346059837551973	Verified	March	2018	TRUE
PAYPAL	03-07-2018 09:12:21	\$1,000.00		\$1,000.00	USD CR	General Payment	Completed		William Russ	texfix@toast.net	19348254482634566	Verified	March	2018	TRUE
PAYPAL	03-08-2018 13:50:50	\$500.00		\$500.00	USD CR	General Payment	Completed		William Russ	texfix@toast.net	19349344040498068	Verified	March	2018	TRUE

PAYPAL	03-16-2018 11:07:40	\$2,500.00	\$2,500.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19358136591609867	Verified	March	2018	TRUE
PAYPAL	04-03-2018 13:26:50	\$1,000.00	\$1,000.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19377933926939619	Verified	April	2018	TRUE
PAYPAL	04-09-2018 07:02:16	\$1,500.00	\$1,500.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19384532762952638	Verified	April	2018	TRUE
PAYPAL	04-17-2018 01:51:23	\$2,500.00	\$2,500.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19393329699030270	Verified	April	2018	TRUE
PAYPAL	05-04-2018 13:21:50	\$2,500.00	\$2,500.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19412017916553473	Verified	May	2018	TRUE
PAYPAL	05-17-2018 12:34:09	\$1,000.00	\$1,000.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19426323503941772	Verified	May	2018	TRUE
PAYPAL	05-20-2018 11:15:13	\$1,000.00	\$1,000.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19429607545434721	Verified	May	2018	TRUE
PAYPAL	05-29-2018 19:37:09	\$500.00	\$500.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19439519154885458	Verified	May	2018	TRUE
PAYPAL	05-31-2018 17:06:06	\$2,500.00	\$2,500.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19441713688878665	Verified	May	2018	TRUE
PAYPAL	06-15-2018 09:35:58	\$2,500.00	\$2,500.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19458203746013561	Verified	June	2018	TRUE
PAYPAL	07-02-2018 11:31:36	\$1,250.00	\$1,250.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19476902370562185	Verified	July	2018	TRUE
PAYPAL	07-05-2018 20:27:30	\$1,250.00	\$1,250.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19480196461876743	Verified	July	2018	TRUE
PAYPAL	07-16-2018 08:34:49	\$2,500.00	\$2,500.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19492282021717220	Verified	July	2018	TRUE
PAYPAL	08-01-2018 14:10:19	\$2,000.00	\$2,000.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19509877241111268	Verified	August	2018	TRUE
PAYPAL	08-06-2018 12:34:38	\$500.00	\$500.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19515365565409018	Verified	August	2018	TRUE
PAYPAL	08-16-2018 07:11:13	\$2,500.00	\$2,500.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19526383784424864	Verified	August	2018	TRUE
PAYPAL	09-03-2018 20:00:25	\$2,500.00	\$2,500.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19546170519322489	Verified	September	2018	TRUE
PAYPAL	09-12-2018 14:27:40	\$1,250.00	\$1,250.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19556252192540623	Verified	September	2018	TRUE
PAYPAL	09-18-2018 10:32:15	\$1,250.00	\$1,250.00	USD	CR	General Payment	Completed							
PAYPAL	10-09-2018 14:57:09	\$1,000.00	\$1,000.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19585755986942086	Verified	October	2018	TRUE
PAYPAL	10-16-2018 12:46:29	\$2,000.00	\$2,000.00	USD	CR	General Payment	Completed							
PAYPAL	10-22-2018 16:51:30	\$2,000.00	\$2,000.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19600051384014681	Verified	October	2018	TRUE
PAYPAL	11-02-2018 13:18:47	\$2,500.00	\$2,500.00	USD	CR	Mobile Payment	Completed							
PAYPAL	11-16-2018 18:52:31	\$2,500.00	\$2,500.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19612324798675450	Verified	November	2018	TRUE
PAYPAL	12-03-2018 11:33:55	\$2,500.00	\$2,500.00	USD	CR	General Payment	Completed							
PAYPAL	12-17-2018 14:47:04	\$2,572.80	\$2,500.00	USD	CR	General Payment	Completed	William Russ	texfix@toast.net	19646411027142742	Verified	December	2018	TRUE
PAYPAL	12-22-2018 18:56:32	\$400.00	\$400.00	USD	CR	Mobile Payment	Completed							
PAYPAL	01-03-2019 17:02:11	\$1,540.23	\$1,500.00	USD	CR	Mobile Payment	Completed	William Russ	texfix@toast.net	19667305192391480	Verified	December	2018	TRUE
PAYPAL	01-14-2019 11:49:10	\$205.32	\$200.00	USD	CR	General Payment	Completed							
PAYPAL	01-17-2019 19:52:47	\$300.00	\$300.00	USD	CR	Mobile Payment	Completed	William Russ	texasfixtures@gmail.com	19680295180853894	Verified	January	2019	TRUE
PAYPAL	01-19-2019 18:25:04	\$800.00	\$800.00	USD	CR	Mobile Payment	Completed							
PAYPAL	10-06-2017 21:41:58	\$30.63	\$30.63	USD	CR	Reversal of General Ac	Completed	William Russ	texasfixtures@gmail.com	19692592165383405	Verified	January	2019	TRUE
PAYPAL	10-09-2017 20:24:25	\$5.55	\$5.55	USD	CR	Reversal of General Ac	Completed							
PAYPAL	10-09-2017 20:24:25	\$25.63	\$25.63	USD	CR	General Credit Card D	Completed	William Russ	texasfixtures@gmail.com	19695899111861544	Verified	January	2019	TRUE
PAYPAL	10-09-2017 20:32:54	\$129.99	\$129.99	USD	CR	General Credit Card D	Completed							
PAYPAL	10-21-2017 03:06:13	\$737.69	\$737.69	USD	CR	Reversal of General Ac	Completed	William Russ	texasfixtures@gmail.com	19698098212956773	Verified	January	2019	TRUE
PAYPAL	10-28-2017 15:02:55	\$170.00	\$170.00	USD	CR	Payment Reversal	Completed							
PAYPAL	10-29-2017 17:00:49	\$1.00	\$1.00	USD	CR	Payment Reversal	Completed	William Russ	texasfixtures@gmail.com	19698098212956773	Verified	January	2019	TRUE
PAYPAL	12-12-2017 15:50:20	\$31.91	\$31.91	USD	CR	Reversal of General Ac	Completed							
PAYPAL	02-06-2018 09:27:07	\$15.00	\$15.00	USD	CR	Payment Reversal	Completed	William Russ	texasfixtures@gmail.com	19698098212956773	Verified	January	2019	TRUE
PAYPAL	04-26-2018 05:17:03	\$0.19	\$0.19	USD	CR	Payment Reversal	Completed							
PAYPAL	04-26-2018 05:17:24	\$222.22	\$222.22	USD	CR	Payment Reversal	Completed	William Russ	texasfixtures@gmail.com	19698098212956773	Verified	January	2019	TRUE
PAYPAL	02-09-2019 02:11:37	\$48.55	\$48.55	USD	CR	Reversal of General Ac	Completed							
PAYPAL	02-26-2019 06:02:23	\$81.12	\$81.12	USD	CR	Reversal of General Ac	Completed	William Russ	texasfixtures@gmail.com	19698098212956773	Verified	January	2019	TRUE
PAYPAL	03-13-2019 07:43:47	\$101.65	\$137.71	SGD	CR	General Currency Con	Completed							
PAYPAL	03-13-2019 07:43:47	\$104.79	\$104.79	USD	CR	Reversal of General Ac	Completed	William Russ	texasfixtures@gmail.com	19698098212956773	Verified	January	2019	TRUE
PAYPAL	03-20-2019 23:19:54	\$106.90	\$106.90	USD	CR	Reversal of General Ac	Completed							
PAYPAL	04-16-2019 12:42:25	\$260.52	\$260.52	USD	CR	Reversal of General Ac	Completed	William Russ	texasfixtures@gmail.com	19698098212956773	Verified	January	2019	TRUE
PAYPAL	04-16-2019 12:42:25	\$260.52	\$260.52	USD	CR	Reversal of General Ac	Completed							

\$93,242.77